Draft Recirculated Environmental Impact Report

SCH# 2022080056

Volume 2

Appendices A.1 through A.6

MALIBU VINEYARDS INDUSTRIAL PARKWAY PROJECT

by Malibu Vineyards, LP

(PP21116)

Specific Plan Amendment No. 161, Map 500
General Plan Amendment No. 9, Map 80
General Plan Amendment No. 23, Map 81
Zone Classification Change No. 13, Map 80
Zone Classification Change No. 92, Map 81
Precise Development Plan No. 2, Map 80
Precise Development Plan No. 74, Map 81
Precise Development Plan No. 75, Map 81

Kern County
Planning and Natural Resources Department
Bakersfield, CA

September 2025

This page intentionally left blank.

Appendices - Volume 2

NOTE TO REVIEWER OF ELECTRONIC FILES:

To assist you in reviewing this electronic document, "bookmarks" and/or "links" have been provided for easier navigation between sections. When available, bookmarks are located in the panel to the left. Links are highlighted in **BLUE** in the Table of Contents. Clicking on either the bookmarks or links will take you to the selected item. This document may consist of multiple linked PDF files. If saving this document to your computer, you must save all corresponding files to a directory on your hard drive to maintain the manner in which these PDF documents are linked.

Appendix A.1: Notice of Preparation and Public Review

Appendix A.3: Notice of Preparation Comments

Appendix A.3: Scoping Meeting Agenda

Appendix A.4: Scoping Meeting Summary

Appendix A.5: DEIR Comment Letter Summary

Appendix A.6: DEIR Comment Letters

This page intentionally left blank.

Appendix A.1

Notice of Preparation and Public Review

This page intentionally left blank.

Lorelei H. Oviatt, AICP, Director
2700 "M" Street, Suite 100
Bakersfield, CA 93301-2323
Phone: (661) 862-8600
Fax: (661) 862-8601 TTY Relay 1-800-735-2929
Email: planning@kerncounty.com
Web Address: http://kernplanning.com/

PLANNING AND NATURAL RESOURCES DEPARTMENT
Planning and Community Development
Administrative Operations

NOTICE OF PREPARATION

DATE: August 3, 2022

TO: See Attached Mailing List

FROM: Kern County Planning and Natural Resources Department
Attn: Matthew Hall, Supervising Planner
2700 "M" Street, Suite 100
Bakersfield, CA 93301
(661) 862-8611,
hallmat@kerncounty.com

RE: NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT (EIR) FOR THE Malibu Vineyards Industrial Parkway Project, By Malibu Vineyards, L.P. (PP21116)

The Kern County Planning and Natural Resources Department, as Lead Agency (pursuant to California Environmental Quality Act [CEQA] Guidelines Section 15052) has determined that preparation of an Environmental Impact Report (EIR) (pursuant to CEQA Guidelines Section 15161) is necessary for the project identified below. The Planning and Natural Resources Department solicits the views of your agency as to the scope and content of the environmental information which is germane to your agency's statutory responsibilities about the proposed project. Your agency will need to use the EIR prepared by our agency when considering your permit or other approval of projects

Due to limits mandated by State law, your response must be received by **September 5, 2022 at 5:00 p.m.** In addition, comments can also be submitted at a **scoping meeting** that will be held at the Kern County Planning and Natural Resources Department on **August 24, 2022 at 1:30 p.m.** at the address shown above.

PROJECT TITLE: Malibu Vineyards Industrial Parkway Project by Malibu Vineyards, L.P.; GPA 9, Map 80; GPA 23, Map 81; ZCC 13, Map 80; ZCC 92, Map 81; PD 2, Map 80; PD 74, Map 81; PD 75, Map 81

PROJECT LOCATION: The project site is located within unincorporated Kern County, north of Imperial Avenue and generally east of State Route 99 (SR 99), with site access from Saco Road and Imperial Avenue. The project site is just east of the City of Shafter, which is on the west side of SR 99, and approximately one mile north of the City of Bakersfield. The Beardsley/Lerdo Canal trends northwest to southeast though the center of project site. The project site is located within portions of Sections 29 and 30, Township 28 South, Range 27 East in the Mount Diablo Base & Meridian (MDBM), and portions of Sections 24 and 25, Township 28 South, Range 26 East, MDBM, and Section 30 of Township 28 South, Range 27 East, MDBM.

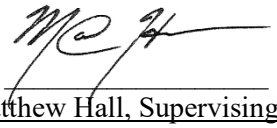
PROJECT DESCRIPTION: The proposed Malibu Vineyards Industrial Parkway Project (proposed project) involves the development of approximately 8,786,734 square feet of industrial use space, comprised of 24 buildings on approximately 739 acres of existing vineyard. The project is proposed by Malibu Vineyards, L.P. (project proponent), and would be developed over two phases.

Implementation of the project, as proposed, would include:

1. General Plan Amendment No. 9, Map No. 80 to change County General Plan Map Code 8.1 (Intensive Agriculture) to 7.2 (Service Industrial).
2. General Plan Amendment No. 23, Map No. 81 to change the Metropolitan Bakersfield General Plan Map Code R-IA (Intensive Agriculture) to SI (Service Industrial).
3. Zone Change No. 13, Map No. 80 to change zoning from A (Exclusive Agricultural) district to M2-PD (Medium Industrial, Precise Development Plan) district.
4. Zone Change No. 92, Map No. 81 (A to M2-PD) to change zoning from A (Exclusive Agricultural) district to M2-PD (Medium Industrial, Precise Development Plan) district.
5. Precise Development Plans to for the following maps:
   a. No. 2, Map No. 80;
   b. No. 74, Map No. 81; and
   c. No. 75, Map No. 81.

To allow the construction and operation of an industrial parkway project including storage and office space, pursuant to Section 19.38.020E of the Kern County Zoning Ordinance.

Document can be viewed online at: https://kernplanning.com/planning/notices-of-preparation/

Signature: 
Name: Matthew Hall, Supervising Planner

Lorelei H. Oviatt, AICP, Director
2700 "M" Street, Suite 100
Bakersfield, CA 93301-2323
Phone: (661) 862-8600
Fax: (661) 862-8601 TTY Relay 1-800-735-2929
Email: planning@kerncounty.com
Web Address: http://kernplanning.com/

PLANNING AND NATURAL RESOURCES DEPARTMENT
Planning and Community Development
Administrative Operations

DATE: August 3, 2022

TO: Surrounding Property Owners within 1,000 Feet of Project Boundary; and, Interested Parties

FROM: Kern County Planning and Natural Resources Department
2700 "M" Street, Suite 100
Bakersfield, CA 93301

RE: Notice of Preparation of a Draft Environmental Impact Report (EIR) – Malibu Vineyards Industrial Parkway Project, By Malibu Vineyards, L.P. (PP21116)

Dear Sir or Madam:

The Kern County Planning and Natural Resources Department has determined that preparation of an Environmental Impact Report (EIR) is necessary for the project identified below. The purpose of this letter is to notify surrounding property owners within 1,000 feet of the project boundaries of this determination. A copy of the Notice of Preparation (NOP) prepared for this project is available for viewing at the following Kern County website: https://kernplanning.com/planning/notices-of-preparation/. The NOP is also available for review at the Planning and Natural Resources Department, located at 2700 "M" Street, Suite 100, Bakersfield, CA 93301.

The purpose of the NOP is to describe the proposed project, specify the project location, and to identify the potential environmental impacts of the project so that Responsible Agencies and interested persons can provide a meaningful response related to potential environmental concerns that should be analyzed in the EIR.

You are invited to view the NOP and submit written comments regarding this project should you wish to do so. Due to the limits mandated by State law, your response must be received by **September 05, 2022 at 5:00 p.m.** Your comments can also be submitted at a **scoping meeting** that will be held at the Kern County Planning and Natural Resources Department on **August 24, 2022 at 1:30 p.m.** at the address shown above.

Please be advised that any comments received after the dates listed above will still be included in the public record for this project and made available to decision makers when this project is scheduled for consideration at a public hearing. Please also be advised that you will receive an additional notice in the mail once a public hearing date is scheduled for this project. You will also be provided additional opportunities to submit comments at that time.

PROJECT TITLE: Malibu Vineyards Industrial Parkway Project by Malibu Vineyards, L.P.; GPA 9, Map 80; GPA 23, Map 81; ZCC 13, Map 80; ZCC 92, Map 81; PD 2, Map 80; PD 74, Map 81; PD 75, Map 81.

PROJECT LOCATION: The project site is located within unincorporated Kern County, north of Imperial Avenue and generally east of State Route 99 (SR 99), with site access from Saco Road and Imperial Avenue. The project site is just east of the City of Shafter, which is on the west side of SR 99, and approximately one mile north of the City of Bakersfield. The Beardsley/Lerdo Canal trends northwest to southeast though the center of project site. The project site is located within portions of Sections 29 and 30, Township 28 South, Range 27 East in the Mount Diablo Base & Meridian (MDBM), and portions of Sections 24 and 25, Township 28 South, Range 26 East, MDBM, and Section 30 of Township 28 South, Range 27 East, MDBM.

PROJECT DESCRIPTION: The proposed Malibu Vineyards Industrial Parkway Project (proposed project) involves the development of approximately 8,786,734 square feet of industrial use space, comprised of 24 buildings on approximately 739 acres of existing vineyard. The project is proposed by Malibu Vineyards, L.P. (project proponent), and would be developed over two phases.

The Beardsley/Lerdo Canal trends northwest to southeast though the center of project site, dividing the two phases of the project. Phase 1 would include seven existing parcels on approximately 534 acres, and is located between Burbank Street to the north, and Imperial Avenue to the south, with the western boundary being the Beardsley/Lerdo Canal. Phase 1 is in Kern County Zone Map 81, as portions of Sections 29 and 30, Township 28 South, Range 27 East in the MDBM.

Phase 2 would include 14 existing parcels on approximately 205 acres, with the western boundary SR 99, and the eastern boundary the Beardsley/Lerdo Canal. The site is located generally south of Lerdo Highway, and north of Imperial Avenue. Phase 2 is in Zone Maps 80 and 81, as portions of Sections 24 and 25, Township 28 South, Range 26 East, MDBM, and Section 30 of Township 28 South, Range 27 East, MDBM.

The project is located solely within the jurisdiction of Kern County, in two Zone Maps (Zone Map 80, and Zone Map 81). The project site is zoned Exclusive Agriculture (A). A portion of the project site is within the Kern County General Plan, designated as Map Code 8.1 (Intensive Agriculture), and a portion of the project site is within the Metropolitan Bakersfield General Plan, designated R-IA (Intensive Agriculture).

To allow the construction and operation of an industrial parkway project including storage and office space, pursuant to Section 19.38.020E of the Kern County Zoning Ordinance, implementation of the project, as proposed, would include:

6. General Plan Amendment No. 9, Map No. 80 to change County General Plan Map Code 8.1 (Intensive Agriculture) to 7.2 (Service Industrial).
7. General Plan Amendment No. 23, Map No. 81 to change the Metropolitan Bakersfield General Plan Map Code R-IA (Intensive Agriculture) to SI (Service Industrial).
8. Zone Change No. 13, Map No. 80 to change zoning from A (Exclusive Agricultural) district to M2-PD (Medium Industrial, Precise Development Plan) district.
9. Zone Change No. 92, Map No. 81 (A to M2-PD) to change zoning from A (Exclusive Agricultural) district to M2-PD (Medium Industrial, Precise Development Plan) district.
10. Precise Development Plans for the following maps:
    a. No. 2, Map No. 80;
    b. No. 74, Map No. 81; and
    c. No. 75, Map No. 81.

Should you have any questions regarding this project, or the Notice of Preparation, please feel free to contact the Project Manager assigned to this case, Matthew Hall, Supervising Planner, at (661) 862-8611 or hallmat@kerncounty.com.

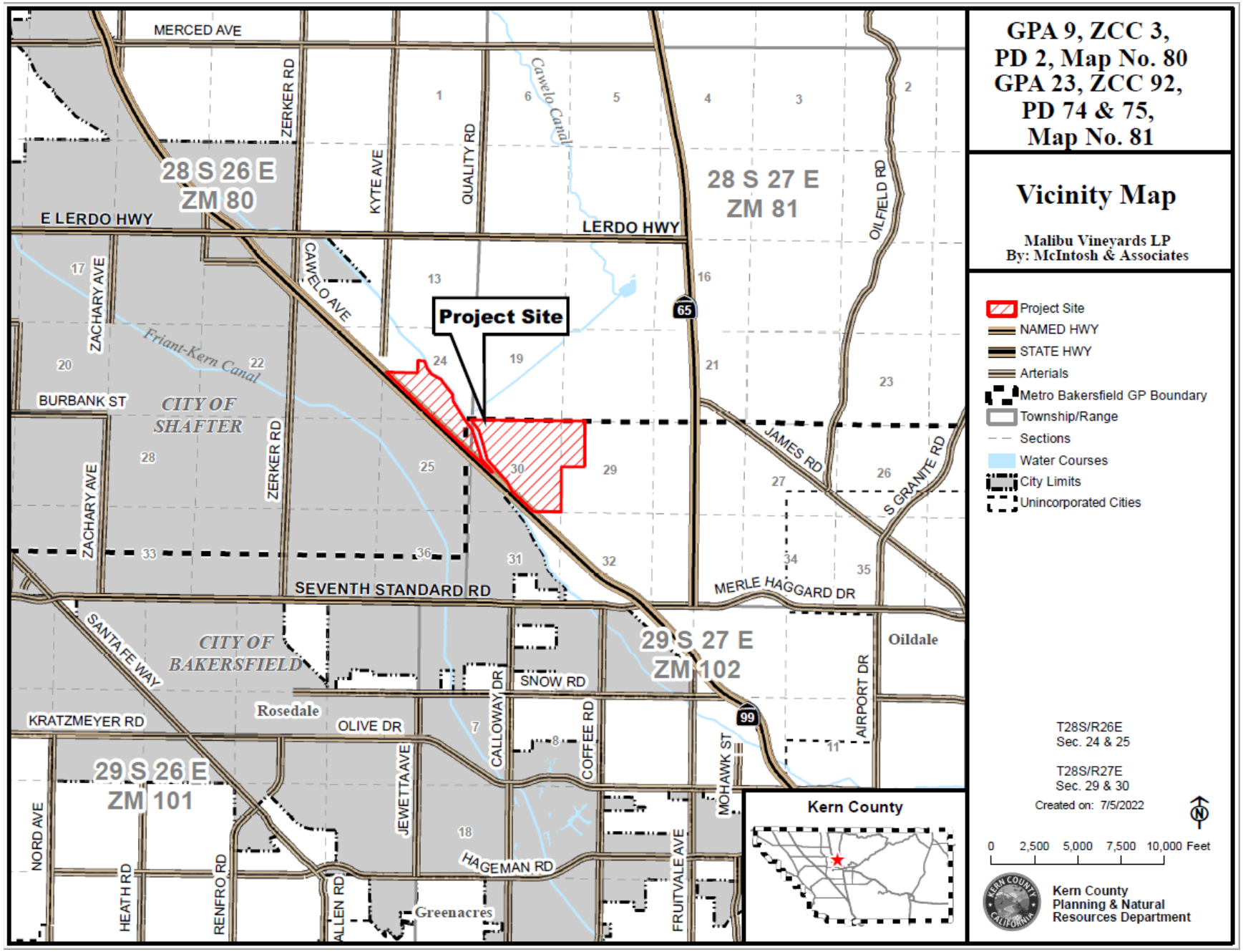
Sincerely,



Matthew Hall, Supervising Planner
Advanced Planning Division

Attachment: Site Vicinity Map showing project boundary

Malibu Industrial Parkway
Attachment: Site Vicinity Map showing project boundary



This page intentionally left blank.

NOP Agency Distribution List

I:\Planning\WORKGRPS\WP\LABELS\Malibu Vineyards Industrial Parkway Project Agencies 05-17-22.docx
cp05-17-22

City of Arvin
P.O. Box 548
Arvin, CA 93203

Bakersfield City Planning Dept
1715 Chester Avenue
Bakersfield, CA 93301

Bakersfield City Public Works Dept
1501 Truxtun Avenue
Bakersfield, CA 93301

California City Planning Dept
21000 Hacienda Blvd.
California City, CA 93515

Delano City Planning Dept
P.O. Box 3010
Delano, CA 93216

City of Maricopa
P.O. Box 548
Maricopa, CA 93252

City of McFarland
401 West Kern Avenue
McFarland, CA 93250

City of Ridgecrest
100 West California Avenue
Ridgecrest, CA 93555

City of Shafter
336 Pacific Avenue
Shafter, CA 93263

City of Taft
Planning & Building
209 East Kern Street
Taft, CA 93268

City of Tehachapi
Attn: John Schlosser
115 South Robinson Street
Tehachapi, CA 93561-1722

City of Wasco
764 E Street
Wasco, CA 93280

Inyo County Planning Dept
P.O. Drawer "L"
Independence, CA 93526

Kings County Planning Agency
1400 West Lacey Blvd, Bldg 6
Hanford, CA 93230

Los Angeles Co Reg Planning Dept
320 West Temple Street
Los Angeles, CA 90012

San Bernardino Co Planning Dept
385 North Arrowhead Avenue, 1st Floor
San Bernardino, CA 92415-0182

San Luis Obispo Co Planning Dept
Planning and Building
976 Osos Street
San Luis Obispo, CA 93408

Santa Barbara Co Resource Mgt Dept
123 East Anapamu Street
Santa Barbara, CA 93101

Tulare County Planning & Dev Dept
5961 South Mooney Boulevard
Visalia, CA 93291

Ventura County RMA Planning Div
800 South Victoria Avenue, L1740
Ventura, CA 93009-1740

U.S. Bureau of Land Management
Caliente/Bakersfield
3801 Pegasus Drive
Bakersfield, CA 93308-6837

Federal Aviation Administration
Western Reg Office/
777 South Aviation Boulevard
Suite 150
El Segundo, CA 90245

Federal Communications Comm
18000 Studebaker Road, #660
Cerritos, CA 90701

U. S. Fish & Wildlife Service
Division of Ecological Services
2800 Cottage Way #W-2605
Sacramento, CA 95825-1846

Environmental Protection Agency
Region IX Office
75 Hawthorn Street
San Francisco, CA 94105

U.S. Dept of Agriculture/NRCS
5080 California Avenue, Ste 150
Bakersfield, CA 93309-0711

U.S. Army Corps of Engineers
Regulatory Division
1325 "J" Street, #1350
Sacramento, CA 95814-2920

U.S. Postal Service
Address Management Systems
28201 Franklin Parkway
Santa Clarita, CA 91383-9321

State Air Resources Board
Stationary Resource Division
P.O. Box 2815
Sacramento, CA 95812

So. San Joaquin Valley Arch Info Ctr
California State University of Bkfd
9001 Stockdale Highway
Bakersfield, CA 93311

Caltrans/Dist 6
Planning/Land Bank Bldg.
P.O. Box 12616
Fresno, CA 93778

Caltrans/
Division of Aeronautics, MS #40
P.O. Box 942873
Sacramento, CA 94273-0001

State Clearinghouse
Office of Planning and Research
1400 - 10th Street, Room 222
Sacramento, CA 95814

State Dept of Conservation
Director's Office
801 "K" Street, MS 24-01
Sacramento, CA 95814-3528

State Dept of Conservation
Geologic Energy Management Division
11000 River Run Boulevard
Bakersfield, CA 93311

Office of the State Geologist
Headquarters
801 "K" Street, MS 12-30
Sacramento, CA 95814

State Dept of Conservation
Office of Land Conservation
801 "K" Street, MS 18-01
Sacramento, CA 95814

State Dept of Conservation
Office of Mine Reclamation
801 "K" Street MS 09-06
Sacramento, CA 95814-3529

State Dept of Conservation
Div Recycling Cert. Sec.
801 "K" Street, MS 19-01
Sacramento, CA 95814

State Mining and Geology Board
801 K Street, MS 20-15
Sacramento, CA 95814

California State University
Bakersfield - Library
9001 Stockdale Highway
Bakersfield, CA 93309

California Energy Commission
James W. Reed, Jr.
1516 Ninth Street
Mail Stop 17
Sacramento, CA 95814

California Fish & Wildlife
1234 East Shaw Avenue
Fresno, CA 93710

State Dept of Food & Agriculture
1220 "N" Street
Sacramento, CA 95814

California Highway Patrol
Planning & Analysis Division
P.O. Box 942898
Sacramento, CA 94298-0001

State Office of Historical Pres
Attention Susan Stratton
P.O. Box 942896
Sacramento, CA 95296-0001

Integrated Waste Management
P.O. Box 4025, MS #15
Sacramento, CA 95812-4025

State Water Resources Control Board
Division of Drinking Water
Attn: Jesse Dhaliwal, Sr. Sanitary Eng
4925 Commerce Drive, Suite 120
Bakersfield, CA 93309

Public Utilities Comm Energy Div
505 Van Ness Avenue
San Francisco, CA 94102

California Regional Water Quality Control Board/Central Valley Region
1685 E Street
Fresno, CA 93706-2020

State Lands Commission
100 Howe Avenue, Ste 100-South
Sacramento, CA 95825-8202

State Dept of Toxic Substance Control
Environmental Protection Agency
1515 Tollhouse Road
Clovis, CA 93612

Cal Environmental Protection Agency/
Dept of Toxic Substances Control, Reg 1
Attn: Dave Kereazis, Permit Div - CEQA
8800 Cal Center Drive, 2nd Floor
Sacramento, CA 95826

State Dept of Water Resources
San Joaquin Dist.
3374 East Shields Avenue, Room A-7
Fresno, CA 93726

Kern County
Agriculture Department

Kern County Airports Department/SOI

Kern County Administrative Officer

Tejon Indian Tribe
Kathy Morgan, Chairperson
1731 Hasti-acres Drive, Suite 108
Bakersfield, CA 93309

Kern County
Env Health Services Department

Kern County Fire Dept
Aaron Duncan, Fire Chief

Kern County Fire Dept
Cary Wright, Fire Marshall

Kern County Library/Beale
Local History Room

Kern County Library/Beale
Andie Sullivan

Wasco Rec & Parks Dist
1280 Poplar Street
Wasco, CA 93280

Kern County Museum
3801 Chester Avenue
Bakersfield, CA 93301

Kern County Sheriff's Dept
Administration

Kern County Public Works Department/
Building & Development/Development Review

Kern County Public Works Department/Operations & Maintenance/Regulatory Monitoring & Reporting

Rosedale Union School Dist
2553 Old Farm Road
Bakersfield, CA 93312

Wasco Union High School Dist
P.O. Box 250
Wasco, CA 93280

Kern High School Dist
5801 Sundale Avenue
Bakersfield, CA 93309

Kern County Superintendent of Schools
Attention School District Facility Services
1300 - 17th Street
Bakersfield, CA 93301

KernCOG
1401 19th Street - Suite 300
Bakersfield, CA 93301

Local Agency Formation Comm/LAFCO
5300 Lennox Avenue, Suite 303
Bakersfield, CA 93309

North of the River Muni Water Dist
P.O. Box 5638
Bakersfield, CA 93388-5638

Cawelo Water Dist
17207 Industrial Farm Road
Bakersfield, CA 93308-9801

Oildale Mutual Water Co
P.O. Box 5638
Bakersfield, CA 93388

Shafter Rec & Parks Dist
700 East Tulare Avenue
Shafter, CA 93263

North of the River Rec & Parks Dist
405 Galaxy Avenue
Bakersfield, CA 93308

Rosedale-Rio Bravo Water Dist
P.O. Box 20820
Bakersfield, CA 93390-0820

Kern County Water Agency
3200 Rio Mirada Drive
Bakersfield, CA 93308

San Joaquin Valley
Air Pollution Control District
1990 East Gettysburg Avenue
Fresno, CA 93726

Kern Mosquito Abatement Dist
4705 Allen Road
Bakersfield, CA 93314

Bakersfield Municipal Airport
4101 Truxtun Avenue
Bakersfield, CA 93309

California City Airport
22636 Airport Way, #8
California City, CA 93505

Delano City Planning Dept
P.O. Box 3010
Delano, CA 93216

Inyokern Airport
P.O. Box 634
Inyokern, CA 93527

Minter Field Airport District
201 Aviation Street
Shafter, CA 93263

Mojave Airport
1434 Flightline
Mojave, CA 93501

East Kern Airport Dist
Attention Stuart Witt
1434 Flightline
Mojave, CA 93501

East Kern Airport Dist Engineer
3900 Ridgemoor Avenue
Bakersfield, CA 93306

Northcutt and Associates
4220 Poplar Street
Lake Isabella, CA 93240-9536

Mountain Valley Airport
P.O. Box 100
Tehachapi, CA 93581

Aero Sports Skypark Corporation
P.O. Box 2567
Rosamond, CA 93560

Rosamond Skypark/Airport
4000 Knox Avenue
Rosamond, CA 93560

Tehachapi City Hall/Airport
115 South Robinson Street
Tehachapi, CA 93561

Adams, Broadwell, Joseph & Cardozo
Attention: Janet M. Laurain
601 Gateway Boulevard, Suite 1000
South San Francisco, CA 94080

AT&T California
OSP Engineering/Right-of-Way
4901 Ashe Road
Bakersfield, CA 93313

Kern Audubon Society
Attn: Frank Bedard, Chairman
4124 Chardonnay Drive
Bakersfield, CA 93306

Los Angeles Audubon
926 Citrus Avenue
Los Angeles, CA 90036-4929

Center on Race, Poverty & the Environment
Attn: Marissa Alexander
1999 Harrison Street – Suite 650
San Francisco, CA 94612

Center on Race, Poverty & the Environmental/
CA Rural Legal Assistance Foundation
1012 Jefferson Street
Delano, CA 93215

Construction Materials Assoc of CA
1029 "J" Street, Suite 420
Sacramento, CA 95814

Defenders of Wildlife/
Kim Delfino, California Dir
980 - 9th Street, Suite 1730
Sacramento, CA 95814

California Farm Bureau
2300 River Plaza Drive, NRED
Sacramento, CA 95833

Native American Heritage
Council
of Kern County
Attn: Gene Albitre
3401 Aslin Street
Bakersfield, CA 93312

Pacific Gas & Electric Co
Matt Coleman, Land Mgt
1918 "H" Street
Bakersfield, CA 93301-4319

Pacific Gas & Electric Co
Land Projects
650 "O" Street, First Floor
Fresno, CA 93760-0001

Sierra Club/Kern Kaweah Chapter
Beyond Coal Campaign
Attn: Sarah Friedman
P.O. Box 3357
Bakersfield, CA 93385

Southern California Gas Co
35118 McMurtrey Avenue
Bakersfield, CA 93308-9477

Southern California Gas Co
Transportation Dept
9400 Oakdale Avenue
Chatsworth, CA 91313-6511

Chumash Council of Bakersfield
2421 "O" Street
Bakersfield, CA 93301-2441

David Laughing Horse Robinson
P.O. Box 20849
Bakersfield, CA 93390

Kern Valley Indian Council
Attn: Robert Robinson, Chairperson
P.O. Box 401
Weldon, CA 93283

California Resources Corp
Attn: Michael D. Gooding
11109 River Run Boulevard
Bakersfield, CA 93311

Santa Rosa Rancheria
Ruben Barrios, Chairperson
P.O. Box 8
Lemoore, CA 93245

Tejon Indian Tribe
Kathy Morgan, Chairperson
1731 Hasti-acres Drive, Suite 108
Bakersfield, CA 93309

Kitanemuk & Yowlumne Tejon
Indians
Chairperson
115 Radio Street
Bakersfield, CA 93305

Tubatulabals of Kern County
Attn: Robert Gomez, Chairperson
P.O. Box 226
Lake Isabella, CA 93240

Tule River Indian Tribe
Neal Peyron, Chairperson
P.O. Box 589
Porterville, CA 93258

Joyce LoBasso
P.O. Box 6003
Bakersfield, CA 93386

Leadership Counsel for Justice &
Accountability
1527 - 19th Street, Suite 212
Bakersfield, CA 93301

LIUNA
Attn: Danny Zaragoza
2201 "H" Street
Bakersfield, CA 93301

Mojave Foundation
Attn: Todd Quelet
16922 Airport Boulevard
Mojave, CA 93501

Northcutt and Associates
4220 Poplar Street
Lake Isabella, CA 93240-9536

Thomas Roads Improvement
Program
PARSONS
1600 Truxtun Avenue, 3rd Floor
Bakersfield, CA 93301

A E Corporation
Planning Department
901 Via Piemonte, 5th Floor
Ontario, CA 91764

Lozeau Drury LLP
1939 Harrison Street, Suite 150
Oakland, CA 94612

NOP Surrounding APN Distribution List

I:\Planning\WORKGRPS\WP\LABELS\Malibu Vineyards PLN-01885 NOP.05-17-22docx.docx
Cp05/17/22

091 160 22 00 5
CAWELO WATER DIST
17207 INDUSTRIAL FARM RD
RR 1
BAKERSFIELD CA 93308

482 050 04 00 1
DOWNS GORDON L & JOYCE M
7500 CALLE NOBLEZA
BAKERSFIELD CA 93309

091 160 10 01 9
GIUMARRA VINEYARDS CORP
PO BOX 1969
BAKERSFIELD CA 93303-1969

482 050 02 01 4
HALLIBURTON ENERGY SERV INC
P O DRAWER 1431
DUNCAN OK 73536-0222

091 210 08 00 9
LENNAR HOMES OF CAL INC
8080 N PALM AV STE 110
FRESNO CA 93711

482 040 15 00 0 **DUP**
LENNAR HOMES OF CAL INC
8080 PALM AV # 110
FRESNO CA 93711

091 200 13 01 9
MALIBU VINEYARDS
9777 WILSHIRE BL STE 900
BEVERLY HILLS CA 90212-1902

091 150 03 00 7 **DUP**
MALIBU VINEYARDS L P
9777 WILSHIRE BL STE 900
BEVERLY HILLS CA 90212-1902

091 130 04 01 3
MZIRP INC
31381 POND RD
MC FARLAND CA 93250

482 010 56 00 0
NO KERN WATER STORAGE DIST
P O BOX 81435
BAKERSFIELD CA 93380-1435

091 060 08 00 6
NORTH KERN WATER STORAGE DIST
33380 CAWELO AV
BAKERSFIELD CA 93308-9575

482 010 05 00 2 **DUP**
NORTH KERN WATER STORAGE DIST
P O BOX 81435
BAKERSFIELD CA 93380-1435

481 060 10 01 3
PARAMOUNT RANCH CO ET AL
33374 LERDO HW
BAKERSFIELD CA 93308

481 060 11 00 7
S & JV PROP LLC
PO BOX 1270
SHAFTER CA 93263-1270

482 010 07 00 8
UNION PACIFIC R/R CO
1400 DOUGLAS ST # 1610
OMAHA NE 68179-1610

482 010 08 00 1 DUP
UNION PACIFIC R/R CO
1400 DOUGLAS ST
OMAHA NE 68179

481 060 12 01 9
VIGNOLO FAMILY L P
PO BOX 1270
SHAFTER CA 93263-1270

091 150 01 00 1
WONDERFUL NUT ORCHARDS LLC
6801 E LERDO HW
SHAFTER CA 93263-9610

091 130 14 00 3
BIDART BROS
4813 CALLOWAY DR
BAKERSFIELD CA 93312-9702

Notice of Completion & Environmental Document Transmittal

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613
For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

SCH #

Project Title: Malibu Vineyards Industrial Parkway Project

Lead Agency: County of Kern | Contact Person: Matthew Hall
Mailing Address: 2700 "M" Street, Suite 100 | Phone: (661) 862-8611
City: Bakersfield | Zip: 93301-2370 | County: Kern

Project Location: County: Kern | City/Nearest Community: Cawelo
Cross Streets: Saco Road and Imperial Avenue | Zip Code: 93308
Longitude/Latitude (degrees, minutes and seconds): 35 ° 50 ′ 603 ″ N / 119 ° 14 ′ 959 ″ W Total Acres: 740
Assessor's Parcel No.: See NOP Table 1 | Section: 24, 25, 29, 30 | Twp.: 28S | Range: 26E, 27E | Base: Mount Diablo
Within 2 Miles: State Hwy #: 99 | Waterways: Beardsley/Lerdo Canal
Airports: Meadows Field Airport | Railways: N/A | Schools: Norris Middle School

Document Type:

CEQA: ☒ NOP ☐ Draft EIR | NEPA: ☐ NOI | Other: ☐ Joint Document
☐ Early Cons ☐ Supplement/Subsequent EIR | ☐ EA | ☐ Final Document
☐ Neg Dec (Prior SCH No.) _____ | ☐ Draft EIS | ☒ Other: Precise Development
☐ Mit Neg Dec Other: _____ | ☐ FONSI

Local Action Type:

☐ General Plan Update ☐ Specific Plan ☒ Rezone ☒ Annexation
☒ General Plan Amendment ☐ Master Plan ☐ Prezone ☐ Redevelopment
☐ General Plan Element ☐ Planned Unit Development ☐ Use Permit ☐ Coastal Permit
☐ Community Plan ☒ Site Plan ☐ Land Division (Subdivision, etc.) ☒ Other: Precise Development

Development Type:

☐ Residential: Units _____ Acres _____
☐ Office: Sq.ft. _____ Acres _____ Employees _____
☐ Commercial: Sq.ft. _____ Acres _____ Employees _____
☒ Industrial: Sq.ft. 10,750,000 Acres Approx 739 Employees 6,000
☐ Educational: _____
☐ Recreational: _____
☐ Water Facilities: Type _____ MGD _____
☐ Transportation: Type _____
☐ Mining: Mineral _____
☐ Power: Type _____ MW _____
☐ Waste Treatment: Type _____ MGD _____
☐ Hazardous Waste: Type _____
☐ Other: _____

Project Issues Discussed in Document:

☒ Aesthetic/Visual ☐ Fiscal ☒ Recreation/Parks ☒ Vegetation
☒ Agricultural Land ☒ Flood Plain/Flooding ☒ Schools/Universities ☒ Water Quality
☒ Air Quality ☒ Forest Land/Fire Hazard ☐ Septic Systems ☒ Water Supply/Groundwater
☒ Archeological/Historical ☒ Geologic/Seismic ☒ Sewer Capacity ☐ Wetland/Riparian
☒ Biological Resources ☒ Minerals ☐ Soil Erosion/Compaction/Grading ☒ Growth Inducement
☐ Coastal Zone ☒ Noise ☒ Solid Waste ☒ Land Use
☒ Drainage/Absorption ☒ Population/Housing Balance ☒ Toxic/Hazardous ☒ Cumulative Effects
☐ Economic/Jobs ☒ Public Services/Facilities ☒ Traffic/Circulation ☒ Other: GHG; Wildfire; Tribal; Energy

Present Land Use/Zoning/General Plan Designation:

Present: Agriculture / A Exclusive Agriculture/ 8.1 Intensive Agriculture and R-IA Intensive Agriculture

Project Description: *(please use a separate page if necessary)*

The proposed Malibu Vineyard Industrial Parkway Project (proposed project) involves the development of approximately 10,750,000 square-feet of industrial warehouse and office use, comprised of 22 buildings on 740 acres of existing vineyard. The project is proposed by Malibu Vineyards, L.P. (project proponent), and would be developed over two phases. Proposed entitlements include: Zone Change No. 13, Map No. 80 to change from A (Exclusive Agriculture) to M-2 PD (Medium Industrial, Precise Development); Zone Change No. 92, Map No. 81 to A (Exclusive Agriculture) to M-2 PD (Medium Industrial, Precise Development); General Plan Amendment No. 9, Map No. 80 to change County General Plan Map Code 8.1 (Intensive Agriculture) to 7.2 (Service Industrial); General Plan Amendment No. 23, Map No. 81 to change the Metropolitan Bakersfield General Plan Map Code R-IA (Intensive Agriculture) to SI (Service Industrial);Annexation of 740 contiguous acres, inclusive of the project site, into the Oildale Mutual Water Company's services.

Note: The State Clearinghouse will assign identification numbers for all new projects. If a SCH number already exists for a project (e.g. Notice of Preparation or previous draft document) please fill in.

Reviewing Agencies Checklist

Lead Agencies may recommend State Clearinghouse distribution by marking agencies below with and "**X**".
If you have already sent your document to the agency please denote that with an "**S**".

S	Air Resources Board	s	Office of Historic Preservation
	Boating & Waterways, Department of		Office of Public School Construction
	California Emergency Management Agency	S	Parks & Recreation, Department of
S	California Highway Patrol		Pesticide Regulation, Department of
S	Caltrans District # 6	S	Public Utilities Commission
S	Caltrans Division of Aeronautics	S	Regional WQCB # 5
s	Caltrans Planning		Resources Agency
	Central Valley Flood Protection Board	s	Resources Recycling and Recovery, Department of
	Coachella Valley Mtns. Conservancy		S.F. Bay Conservation & Development Comm.
	Coastal Commission		San Gabriel & Lower L.A. Rivers & Mtns. Conservancy
	Colorado River Board		San Joaquin River Conservancy
S	Conservation, Department of		Santa Monica Mtns. Conservancy
	Corrections, Department of		State Lands Commission
	Delta Protection Commission		SWRCB: Clean Water Grants
	Education, Department of	S	SWRCB: Water Quality
S	Energy Commission		SWRCB: Water Rights
S	Fish & Game Region # 4		Tahoe Regional Planning Agency
S	Food & Agriculture, Department of	S	Toxic Substances Control, Department of
s	Forestry and Fire Protection, Department of	S	Water Resources, Department of
	General Services, Department of		
S	Health Services, Department of		Other:
	Housing & Community Development		Other:
	Native American Heritage Commission		

Local Public Review Period (to be filled in by lead agency)

Starting Date August 03, 2022 Ending Date September 05, 2022

Lead Agency (Complete if applicable):

Consulting Firm: Rincon Consultants, Inc.
Address: 250 East 1st Street, Suite 1400
City/State/Zip: Los Angeles, CA 90012
Contact: Deanna Hansen
Phone: (213) 279-2108, ext. 2056

Applicant: Malibu Vineyards, L.P.
Address: 9777 Wilshire Boulevard, Suite 900
City/State/Zip: Beverly Hills, CA 90212
Phone: (805) 305-0753

Signature of Lead Agency Representative: /s/ **Date:** August 03, 2022

Authority cited: Section 21083, Public Resources Code. Reference: Section 21161, Public Resources Code.

INITIAL STUDY/NOTICE OF PREPARATION

Malibu Vineyards Industrial Parkway Project
by Malibu Vineyards, L.P.

General Plan Amendment No. 9, Map No. 80
General Plan Amendment No. 23, Map No. 81
Zone Change No. 13, Map No. 80
Zone Change No. 92, Map No. 81
Precise Development Plan No. 2, Map 80
Precise Development Plan No. 74, Map 81
Precise Development Plan No. 75, Map 81

PLN – 19-01885 (PP21116)

LEAD AGENCY:

Kern County Planning and Natural Resources Department
2700 "M" Street, Suite 100
Bakersfield, CA 93301-2370
Contact: Matthew Hall
(661) 862-8611
HallMat@kerncounty.com

August 2022

This page is intentionally left blank.

Table of Contents

Initial Study Checklist

1. Project Description 1
1.1. Project Location 1
1.2. Environmental Setting 7
1.3. Proposed Project Description 13
Project Overview 19
Site Access and Internal Circulation 20
Landscaping and Irrigation 20
Stormwater Management and Drainage Design 20
Utilities 21
Operational Water Requirements 21
Construction Activities 21
1.4. Project Objectives 22
1.5. Proposed Discretionary Actions/Required Approvals 23
Federal 23
State 23
Local 23
2. Kern County Environmental Checklist Form 25
2.1. Environmental Factors Potentially Affected 25
2.2. Determination 25
3. Evaluation of Environmental Impacts 26
I. Aesthetics 27
II. Agriculture and Forest Resources 29
III. Air Quality 31
IV. Biological Resources 33
V. Cultural Resources 35
VI. Energy 36
VII. Geology and Soils 37
VIII. Greenhouse Gas Emissions 40
IX. Hazards and Hazardous Materials 41
X. Hydrology and Water Quality 45
XI. Land Use and Planning 48
XII. Mineral Resources 49
XIII. Noise 50
XIV. Population and Housing 52
XV. Public Services 53
XVI. Recreation 55
XVII. Transportation and Traffic 56

XVIII. Tribal Cultural Resources 58
XIX. Utilities and Service Systems 59
XX. Wildfire 61
XXI. Mandatory Findings of Significance 62
4. References 64

List of Figures

Figure 1, Regional Vicinity Map 3
Figure 2, Project Location Map 4
Figure 3, Project Vicinity Map 5
Figure 4, Assessor's Parcelization Map 6
Figure 5, Existing General Plan Map 8
Figure 6, Existing Zoning Map 9
Figure 7, Airport Land Use Compatiblity Plan Map 12
Figure 8, Proposed General Plan Map 14
Figure 9, Proposed Zoning Map 15
Figure 10, Phase 1 Site Plan 74, Map No. 81 16
Figure 11, Phase 2 Site Plan 2, Map No. 80 17
Figure 12, Phase 2 Site Plan 75, Map No. 81 18

List of Tables

Table 1 Acres, Map Code Designations and Zoning by Existing Parcel for Phase 1 and Phase 2 2
Table 2 Existing Land Use and Zoning Summary 10
Table 3 Summary for Phase 1 and Phase 2 19

1. Project Description

1.1. Project Location

The proposed Malibu Vineyards Industrial Parkway Project (proposed project) is located within unincorporated Kern County, north of Imperial Avenue and generally east of State Route 99 (SR 99), with site access from Saco Road and Imperial Avenue. The project site would be comprised of 21 Assessor's Parcel Numbers (APN) totaling 746 acres according to the County's existing parcel data. The project site is just east of the City of Shafter, which is on the west side of SR 99, and approximately one mile north of the City of Bakersfield. See **Figure 1**, *Regional Vicinity Map*; **Figure 2**, *Project Location Map*; and **Figure 3**, *Project Vicinity Map*, below, for further detail.

The project is proposed by Malibu Vineyards, L.P. (project proponent) and would be developed over two phases. The Lerdo Canal trends northwest to southeast though the center of project site, dividing the two phases of the project. Phase 1 would include 7 parcels on approximately 534 acres of the total acreage, and is located between Burbank Street to the north, and Imperial Avenue to the south, with the western boundary being the Lerdo Canal. Phase 1 is in Kern County Zone Map 81, as portions of Sections 29 and 30, Township 28 South, Range 27 East in the Mount Diablo Base & Meridian (MDBM).

Phase 2 would include 14 parcels on approximately 205 acres of the total acreage, with the western boundary SR 99, and the eastern boundary the Lerdo Canal. The site is located generally south of Lerdo Highway, and north of Imperial Avenue. Phase 2 is in Zone Maps 80 and 81, as portions of Sections 24 and 25, Township 28 South, Range 26 East, MDBM, and Section 30 of Township 28 South, Range 27 East, MDBM. **Table 1**, *Acres, Map Code Designations and Zoning by Existing Parcel for Phase 1 and Phase 2,* below, identifies the acreage, applicable map code and zoning existing parcel data whereas **Figure 4**, *Assessor's Parcelization Map*, below, illustrates the existing parcel layout within the project site.

Table 1 Acres, Map Code Designations and Zoning by Existing Parcel for Phase 1 and Phase 2

APN	Map	Size (acres)	Metropolitan Bakersfield General Plan Map Code Designation	Existing County Zoning
Phase 1				
482-010-01	81	240.00	Intensive Agriculture (R-IA)	Exclusive Agriculture (A)
482-010-02	81	79.09	Intensive Agriculture (R-IA)	Exclusive Agriculture (A)
482-010-03	81	96.75	Intensive Agriculture (R-IA)	Exclusive Agriculture (A)
482-010-11	81	80.19	Intensive Agriculture (R-IA)	Exclusive Agriculture (A)
482-040-01	81	15.85	Intensive Agriculture (R-IA)	Exclusive Agriculture (A)
482-040-02	81	11.55	Intensive Agriculture (R-IA)	Exclusive Agriculture (A)
482-040-03	81	13.80	Intensive Agriculture (R-IA)	Exclusive Agriculture (A)
Total: 7		**537**		
Phase 2				
APN	**Map**	**Size (acres)**	**Kern County General Plan Map Code Designation**	**Existing County Zoning**
091-150-03	80	9.44	Intensive Agriculture (8.1)	Exclusive Agriculture (A)
091-160-01	80	11.08	Intensive Agriculture (8.1)	Exclusive Agriculture (A)
091-160-02	80	40.60	Intensive Agriculture (8.1)	Exclusive Agriculture (A)
091-160-03	80	18.22	Intensive Agriculture (8.1)	Exclusive Agriculture (A)
091-160-09	80	28.99	Intensive Agriculture (8.1)	Exclusive Agriculture (A)
091-160-13	80	10.50	Intensive Agriculture (8.1)	Exclusive Agriculture (A)
091-160-16	80	29.45	Intensive Agriculture (8.1)	Exclusive Agriculture (A)
091-200-04	80	7.41	Intensive Agriculture (8.1)	Exclusive Agriculture (A)
091-200-05	80	17.01	Intensive Agriculture (8.1)	Exclusive Agriculture (A)
091-200-07	80	5.56	Intensive Agriculture (8.1)	Exclusive Agriculture (A)
091-200-14	80	16.03	Intensive Agriculture (8.1)	Exclusive Agriculture (A)
APN	**Map**	**Size (acres)**	**Metropolitan Bakersfield General Plan Map Code Designation**	**Existing County Zoning**
091-200-13	81	2.43	Intensive Agriculture (R-1A)	Exclusive Agriculture (A)
482-040-04	81	11.48	Intensive Agriculture (R-IA)	Exclusive Agriculture (A)
482-040-05	81	0.67	Intensive Agriculture (R-IA)	Exclusive Agriculture (A)
Total: 14		**209**		

APN=Assessor's Parcel Number

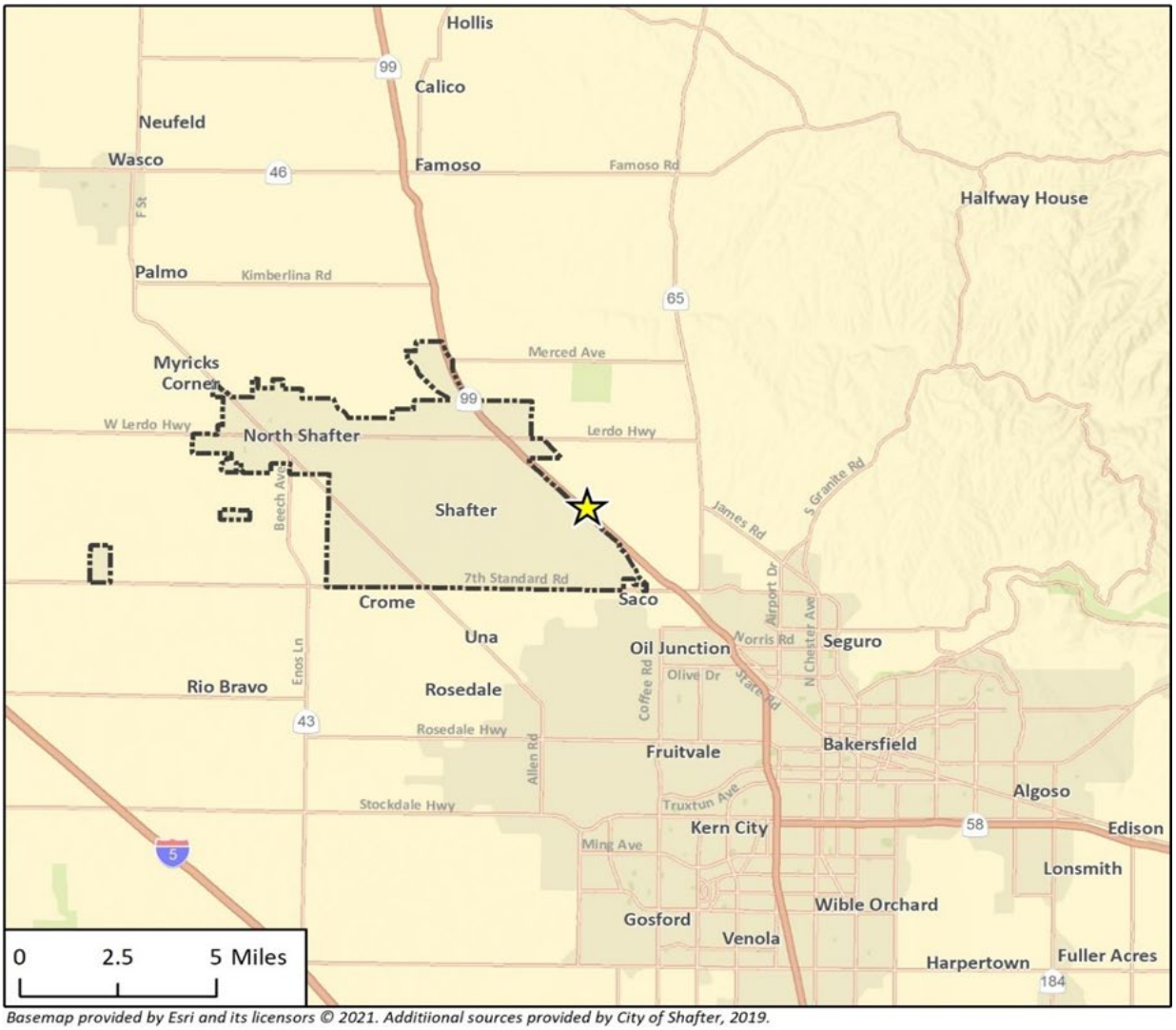


Figure 1, Regional Vicinity Map

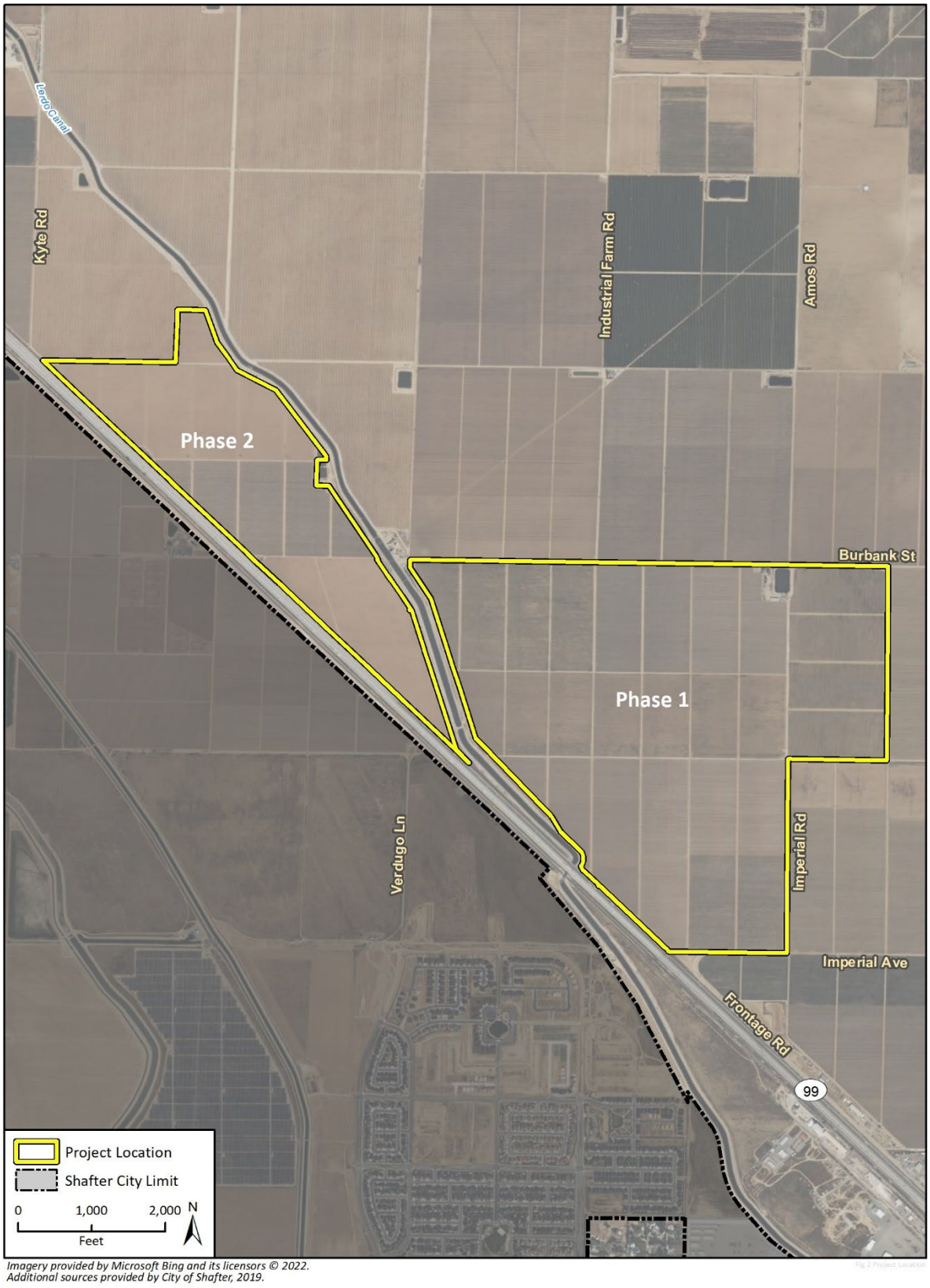


Figure 2, Project Location Map

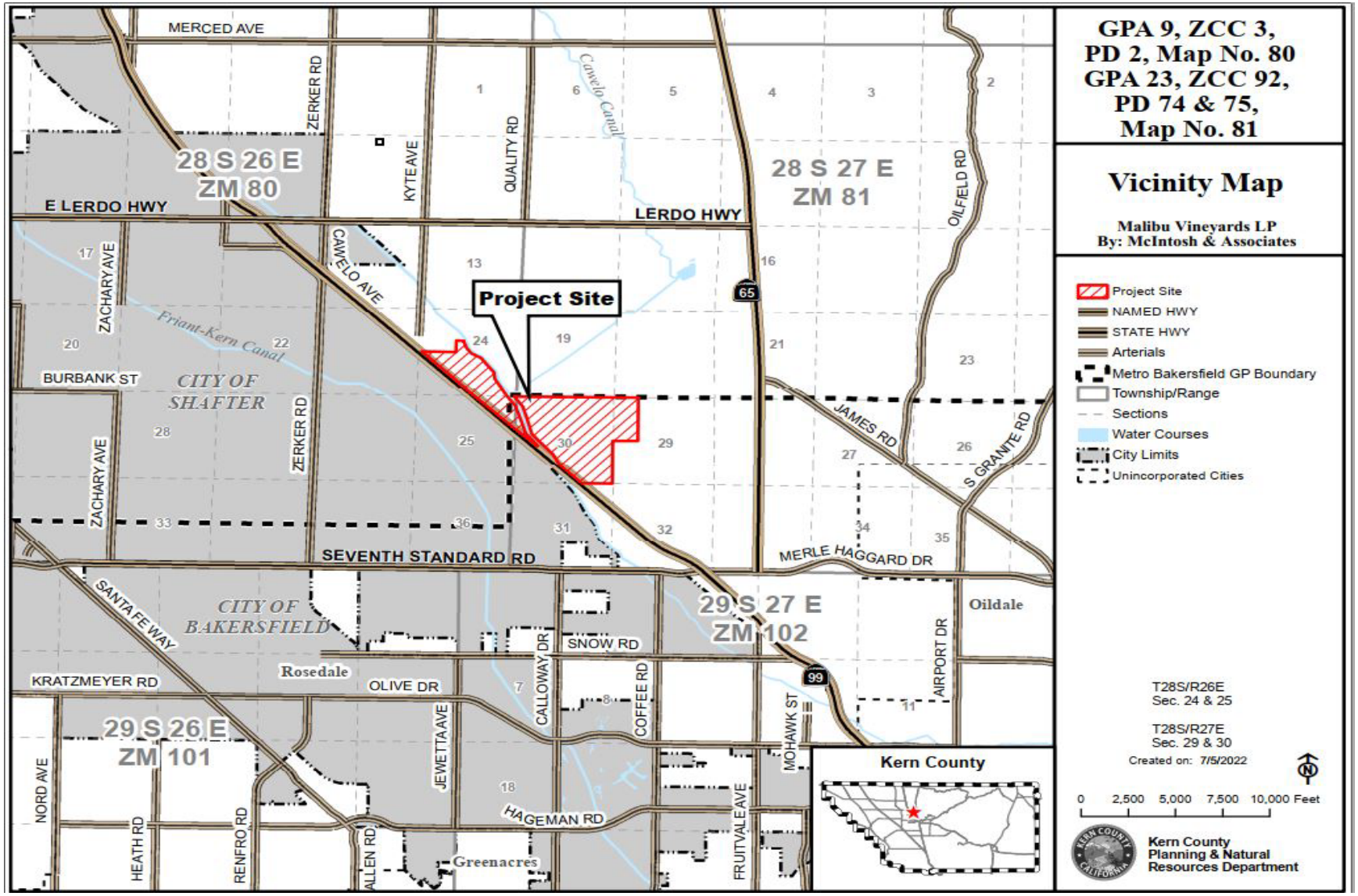


Figure 3, Project Vicinity Map

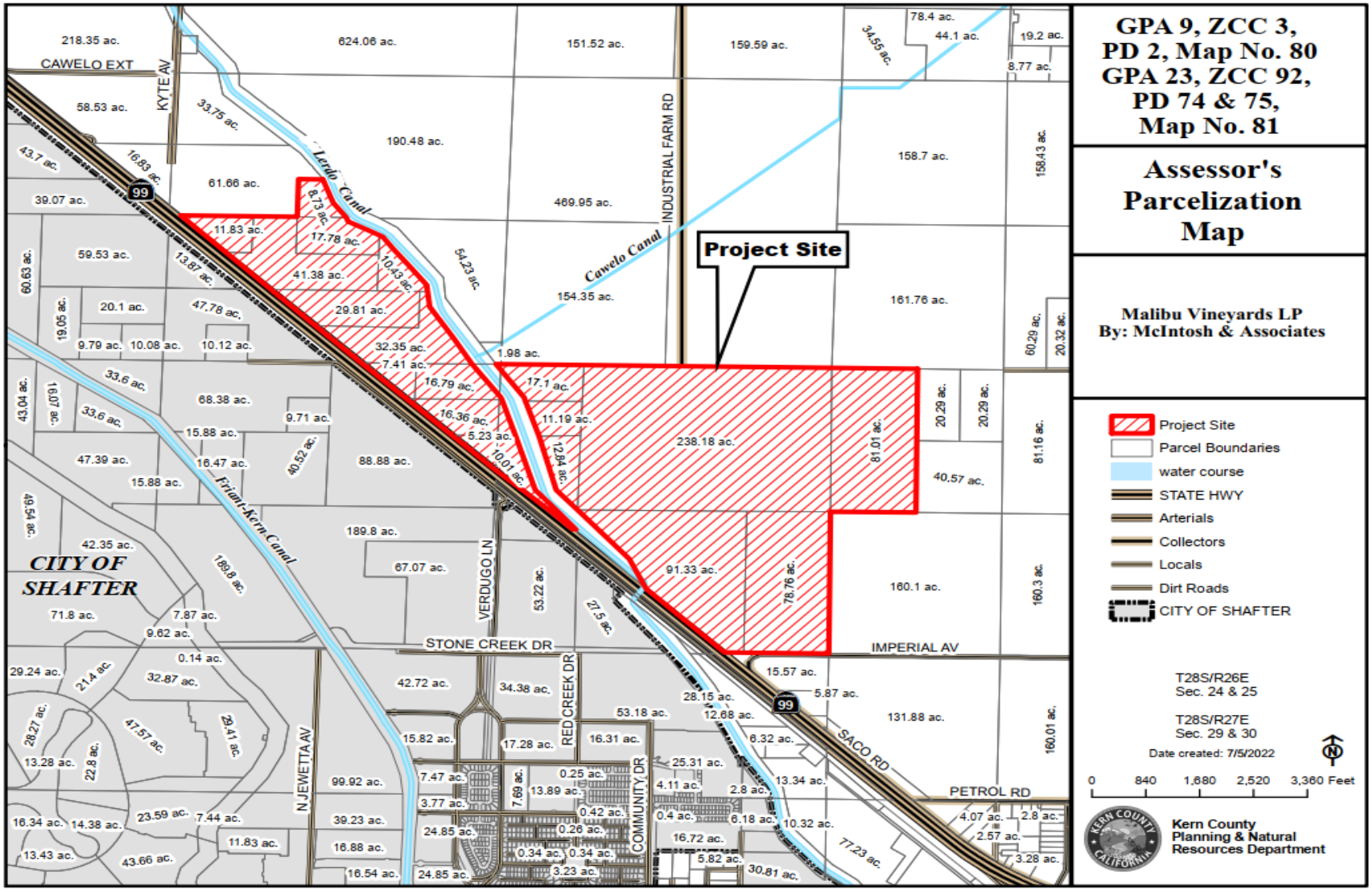


Figure 4, Assessor's Parcelization Map

1.2. Environmental Setting

The project site is located on agricultural land within unincorporated Kern County. The parcels are currently owned by Malibu Vineyards, L.P., with a portion of the property being utilized for growing table grapes. A review of historic aerial maps indicates the site has been used for grape vineyards since at least 2003. There exists a structure located on the eastern portion of the site that appears to be used as an agricultural storage building. The site includes outdoor storage of various farm related operational equipment, along with a fenced and secured concrete floor storage shed for pesticides. Agricultural uses are adjacent north of the project site. The project site can be accessed from Saco Road, Burbank Street and Imperial Avenue.

Approximately 314 acres of the project site are designated Prime Farmland (California Department of Conservation [DOC] 2019). There are no Williamson Act contracts associated with the project site.

The proposed project is located solely within the jurisdiction of Kern County, in two Zone Maps (Zone Map 80, and Zone Map 81). The project site is zoned Exclusive Agriculture (A). A portion of the project site is within the Kern County General Plan, designated as Map Code 8.1 (Intensive Agriculture), and a portion of the project site is within the Metropolitan Bakersfield General Plan, designated R-IA (Intensive Agriculture). For further detail see Figure 5, *Existing General Plan Map,* **Figure 6**, Existing Zoning Map, and **Table 2**, *Existing Land Use and Zoning Summary*, below.

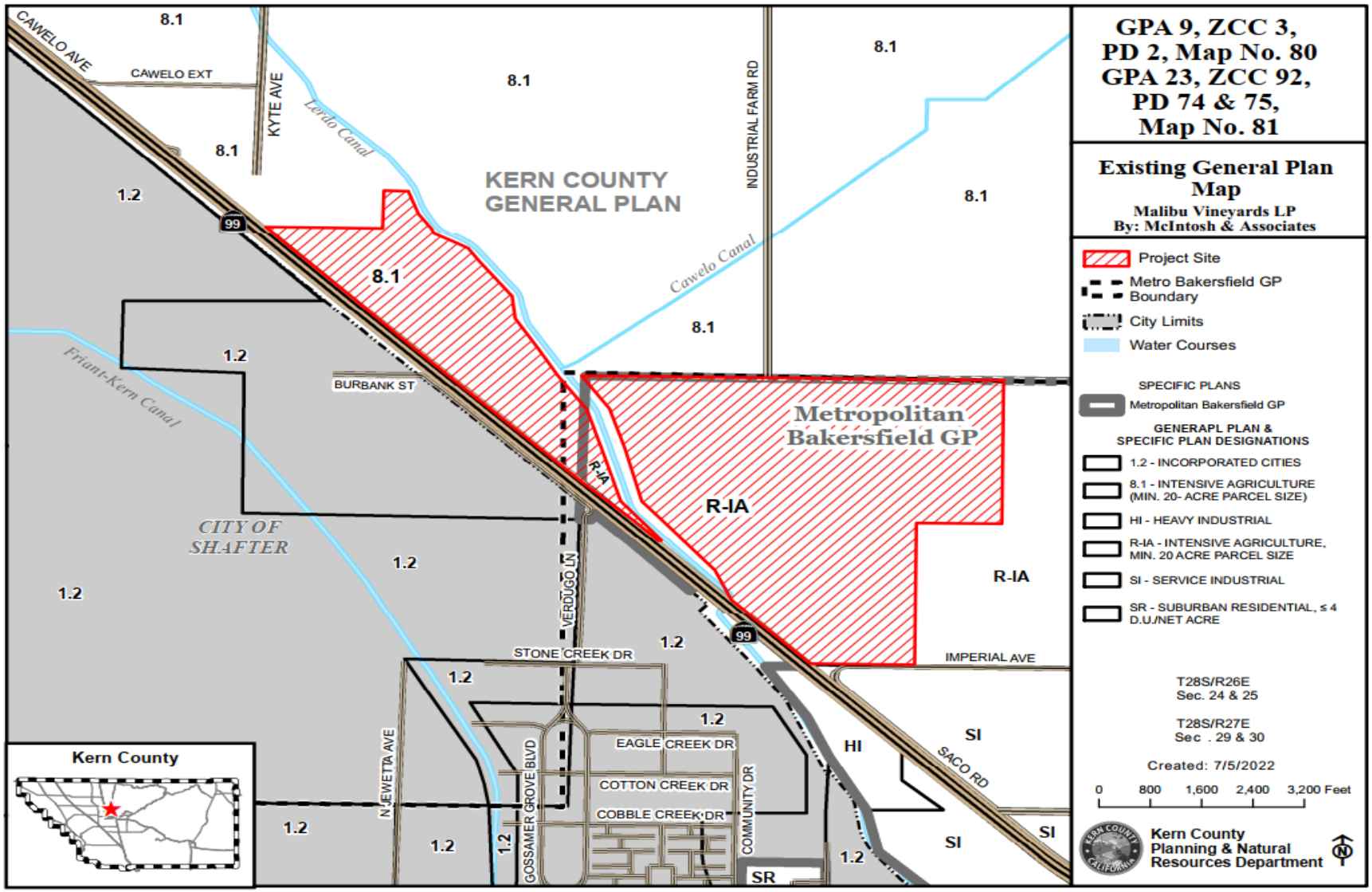


Figure 5, Existing General Plan Map

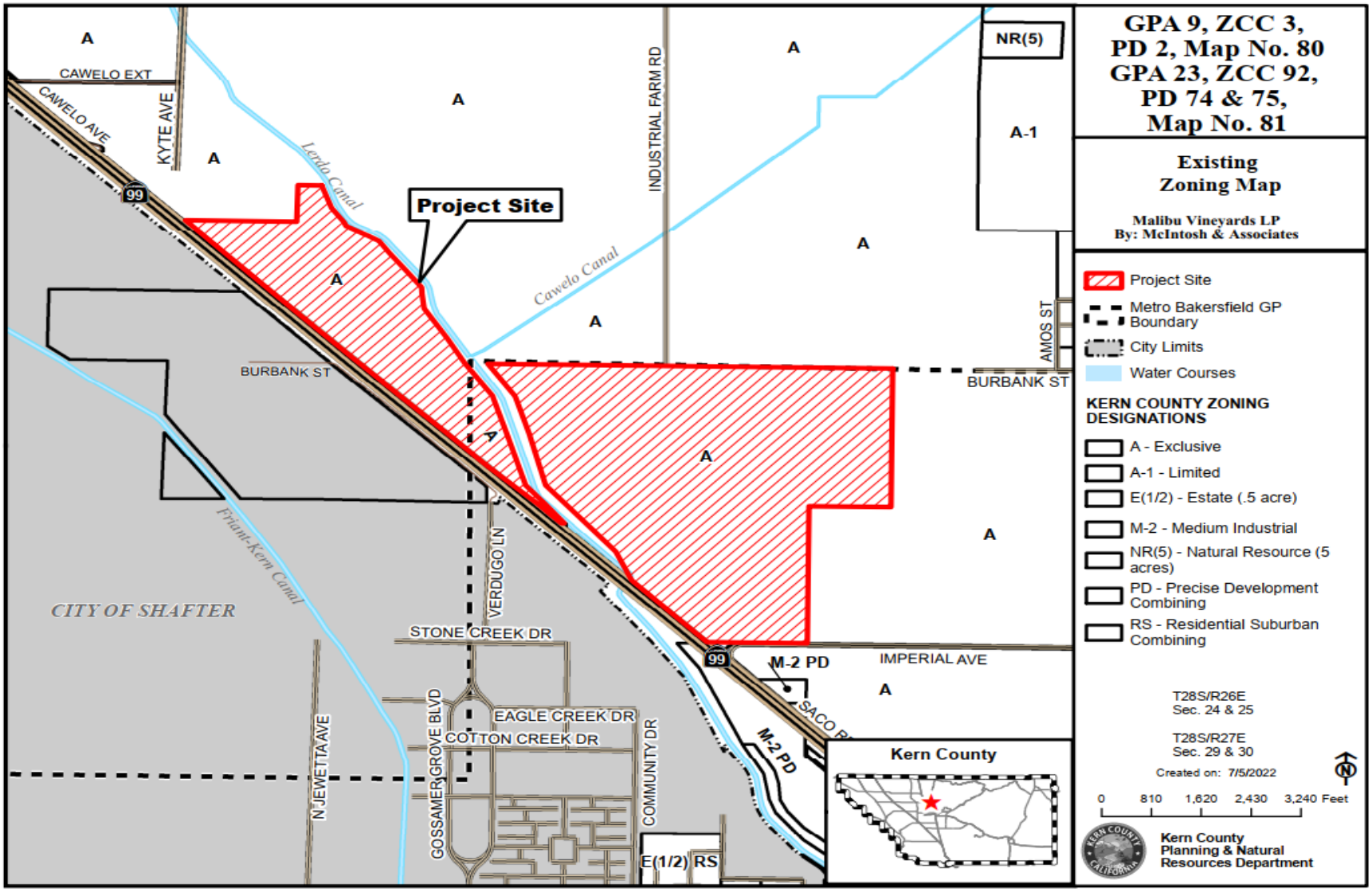


Figure 6, Existing Zoning Map

Table 2 Existing Land Use and Zoning Summary

Location	Existing Land Use	Jurisdiction	Zoning	Map Code Designation
Project Site Phase 1	Agriculture	Kern County	Exclusive Agriculture (A)	Intensive Agriculture (R-IA)
Phase 2	Agriculture	Kern County	Exclusive Agriculture (A)	Intensive Agriculture (R-IA) Intensive Agriculture (8.1)
North	Agriculture	Kern County	Exclusive Agriculture (A)	Intensive Agriculture (8.1)
East	Agriculture, vacant, residential, industrial	Kern County	Exclusive Agriculture (A)	Intensive Agriculture (8.1) Intensive Agriculture (R-IA)
South	Agriculture, industrial	Kern County	Exclusive Agriculture (A) Medium Industrial, Precise Development Combining (M-2 PD)	Service Industrial (SI) Heavy Industrial (H1)
South	Agriculture, Industrial	City of Shafter	General Commercial (GC)	Incorporated Cities (1.2)
West	Agriculture	City of Shafter	Exclusive Agriculture (A) Industrial (I) General Commercial (GC)	Incorporated Cities (1.2)

The Lerdo Canal flows southeast to northwest along the eastern boundary of the Phase 2 portion of the project, and the western boundary of the Phase 1 portion of the project, effectively dividing the two phases of the project. SR 99 is along the west side of the proposed project site. Surrounding roads are mostly dirt roads used for access to agricultural areas. The project site can be accessed from Saco Road, Burbank Street and Imperial Avenue.

The project site is located in a relatively flat-lying plain at approximately 440 feet above sea level. Within the project limits, heavy road compaction, along the perimeter and throughout the site, is evident. The project site is located in Federal Emergency Management Flood Zone X, indicating an area with a 0.2 percent annual chance of flooding (Federal Emergency Management Agency [FEMA] 2008).

There are no mapped fault zones associated with the project site (McIntosh & Associates 2020). No known surface or subsurface faults have been mapped transecting any of the properties comprising the proposed project. The nearest fault zone is the Premier Fault Zone located approximately 1.3 miles east of the northeast corner of the project site, on James Road 150 feet east of State Route 65 (SR 65). The largest fault in the area, the Kern Front Fault, is located approximately 3.7 miles east of the eastern project boundary. The nearest active major fault is the Helendale-South Lockhart fault, located approximately 9.2 miles northeast of the project site.

The project site is not within a mineral recovery area or within a designated mineral and petroleum resource site designated by the Kern County General Plan. The project site is not located within the County's Natural Resources (NR) zone or Tier 1 Oil and Gas Conformity Tier.

The closest area with NR zoning and Tier 1 Oil and Gas Conformity Tier is approximately two miles from the site. The closest active well is 3,650 feet south of the project site in the city of Shafter.

Kern County is relatively dry, receiving approximately nine inches of rain annually, with the 52 percentile of annual rain fall occurring in spring. The project vicinity experiences high temperatures (85 degrees and up) for at least two months out of the year (July and August), with an average temperature of 86 degrees Fahrenheit during these months. The area experiences moderate average temperatures (65 to 85 degrees Fahrenheit) from April to June and September to October, and cooler average temperatures (below 65 degrees Fahrenheit) from November through March.

The project area is served by the Kern County Sheriff's Department for law enforcement and public safety services (Kern County Sheriff's Office, 1350 Norris Road), Kern County Fire Department for fire protection services (Fire Station #62, 1652 Sunnyside Court), and Kern County Medical Emergency Services for medical care and emergency services.

Southern portions of the project site are within the Airport Land Use Compatibility Plan (ALUCP) for the Meadows Field Airport located approximately 3.5 miles southeast. These portions of the project are in ALUCP Zone B2, which may require a dedication of avigation easement and Zone C, which limits high-rise office buildings to no more than four stories. See **Figure 7,** *Airport Land Use Compatibility Plan Map,* below.

The closest schools to the project site are Norris Middle School two miles south and Norris Elementary School is 2.6 miles southwest.

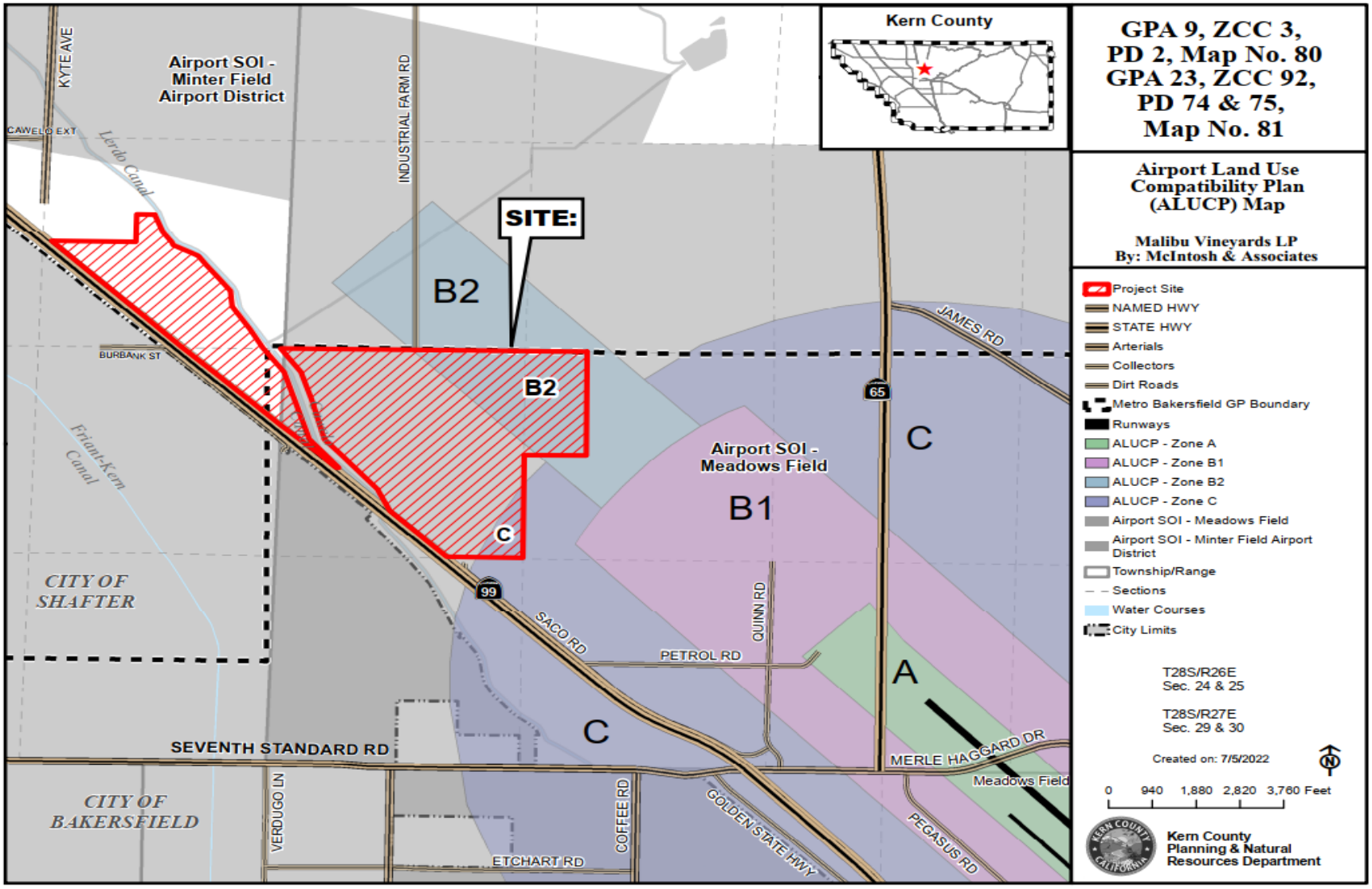


Figure 7, Airport Land Use Compatiblity Plan Map

1.3. Proposed Project Description

The site has the potential to provide approximately 30 million square feet that would support warehouse, light industrial and high-cube warehouse, with supporting office space. The proposed project involves the development of an industrial park with approximately 8,907,446 square feet of industrial warehouse and office use space on approximately 739 acres of existing vineyards and fallow land.

The proposed project includes applications for General Plan Amendments, Zone Changes, and Precise Development Plans to allow for the construction and operation of an industrial park with warehousing, offices, and distribution facilities. Amendments to the Kern County General Plan parcel designations of Intensive Agriculture (8.1) to Service Industrial (7.2), and amendments to the Metropolitan Bakersfield General Plan parcels from Intensive Agriculture (R-IA) to Service Industrial (SI), are illustrated in **Figure 8**, *Proposed General Plan Map,* below. The project would also require a Zone Change from Exclusive Agriculture (A) to Medium Industrial, Precise Development (M-2 PD) pursuant to Chapter 19.38 of the Kern County Zoning Ordinance. The proposed zoning is illustrated in **Figure 9**, *Proposed Zoning Map*, below.

The industrial park would consist of 22 industrial (warehouse) buildings and additional mini warehouses, with associated office space and truck docks, parking, and access roads, on approximately 739 acres in unincorporated Kern County. The buildings would be located among 21 parcels developed over two phases and would total 8,907,446 square feet of industrial warehouse and office use space. See project site plans in **Figure 10**, *Phase 1 PD Plan 74, Map No. 81*; **Figure 11**, *Phase 2 PD Plan 2, Map No. 80* and **Figure 12**, *Phase 2 Site Plan 75, Map No. 80*, below. A summary of the building area square feet for the two phases is provided in **Table 3**, *Summary for Phase 1 and Phase 2,* below.

Phase 1 involves development of 14 buildings totaling up to 7,242,106 square feet of warehouse and office space on approximately 534 acres. Phase 1 would also include 6,439,657 square feet of landscape area. Parking would include 4,796 standard spaces, and 3,568 truck parking spaces, for a total of 8,364 spaces.

Phase 2 involves development of 8 buildings and additional mini warehouses totaling up to 1,665,340square feet of warehouse and office space, on approximately 205 acres. Phase 2 would also include 1,969,669 square feet of landscape area. Parking would include 2,157 standard parking spaces, and 924 truck parking spaces for a total of 3,081 spaces. Of the total 8,907,446 square feet of industrial warehouse and office use space, up to 25 percent, or approximately 2,226,862 square feet, would consist of refrigerated warehouse space.

Most of the buildings would be up to 52 to 100 feet in height except for 20 percent of the buildings to be “high cube” and possibly up to 135 feet in height. With respect to building setbacks, all buildings over 75 feet in height would be setback an additional foot from the centerline of the street for each three feet in height above 75 feet. Furthermore, all 100-foot-tall buildings would be setback a minimum of 49 feet from the centerline of the street, and all 135-foot-tall buildings would be setback a minimum of 60 feet from the centerline of the street.

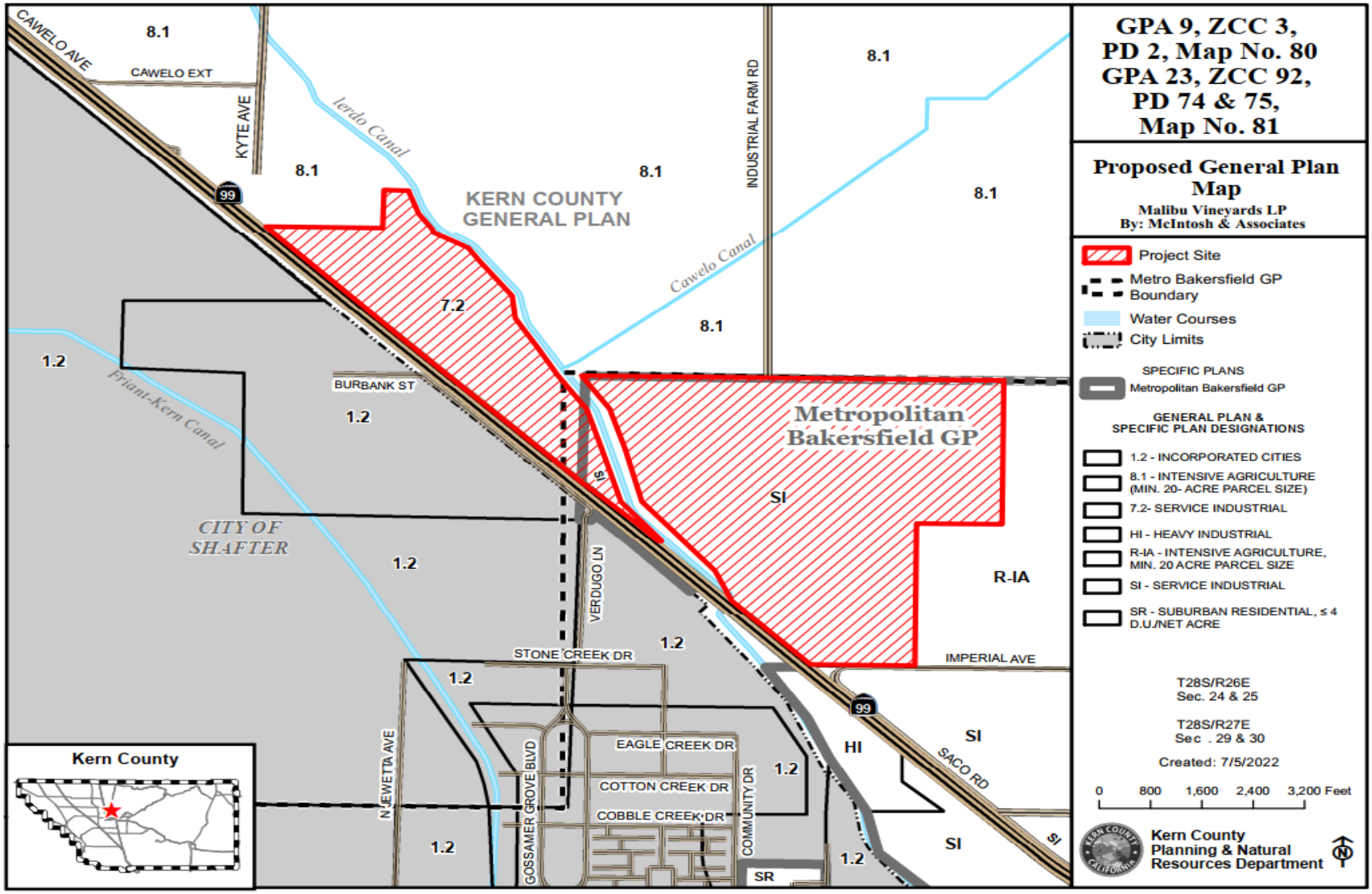


Figure 8, Proposed General Plan Map

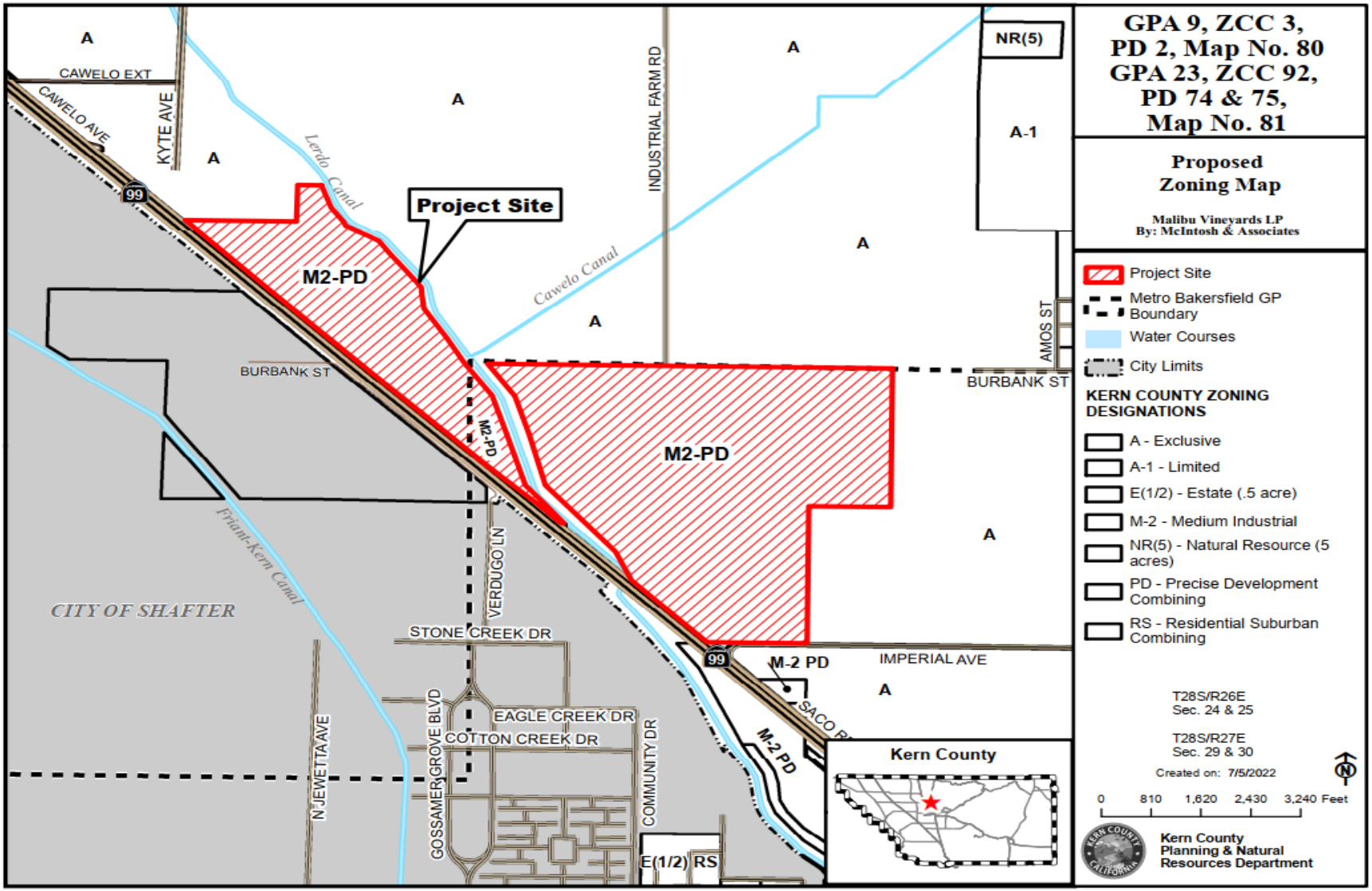


Figure 9, Proposed Zoning Map

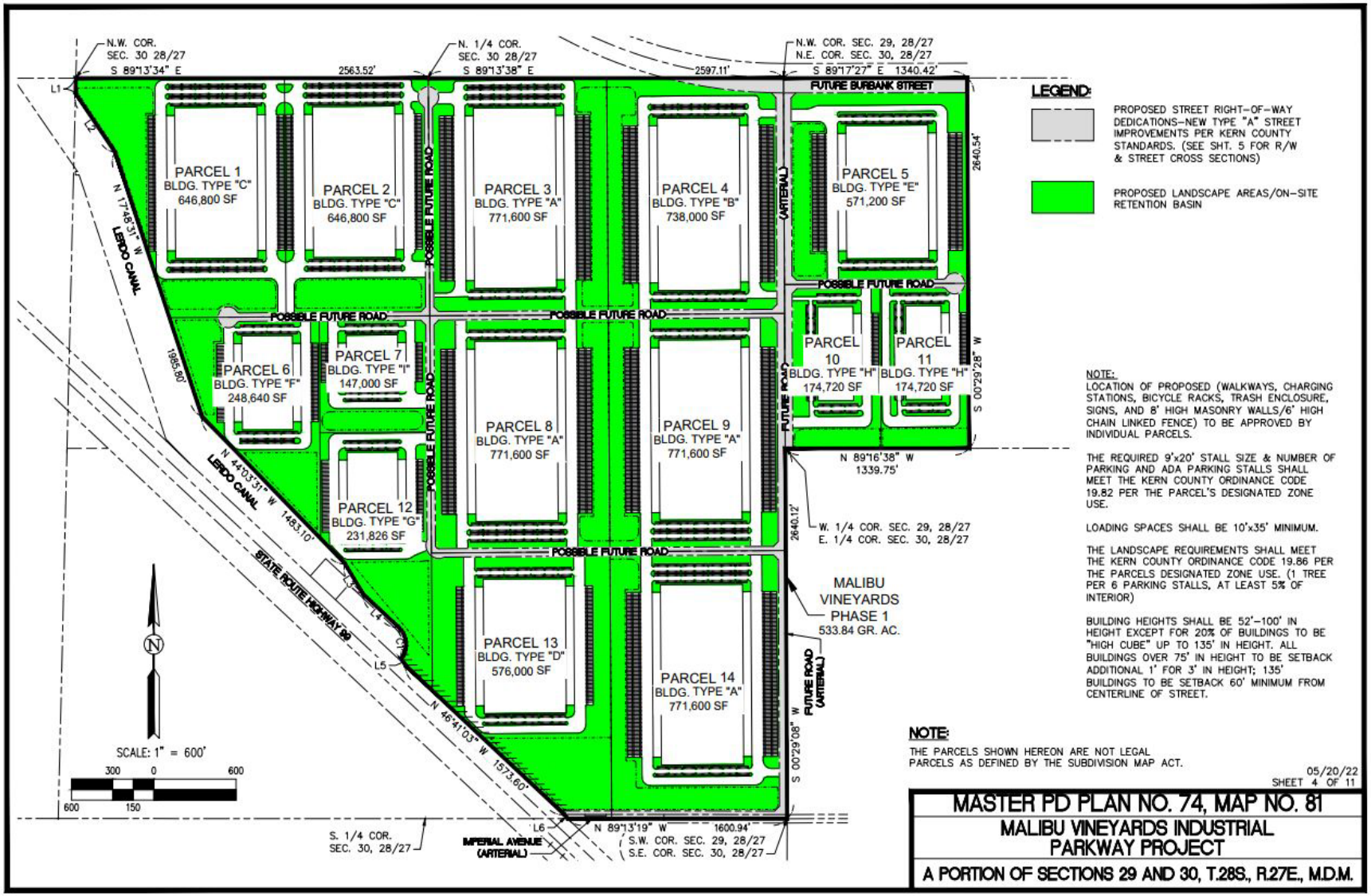


Figure 10, Phase 1 Site Plan 74, Map No. 81

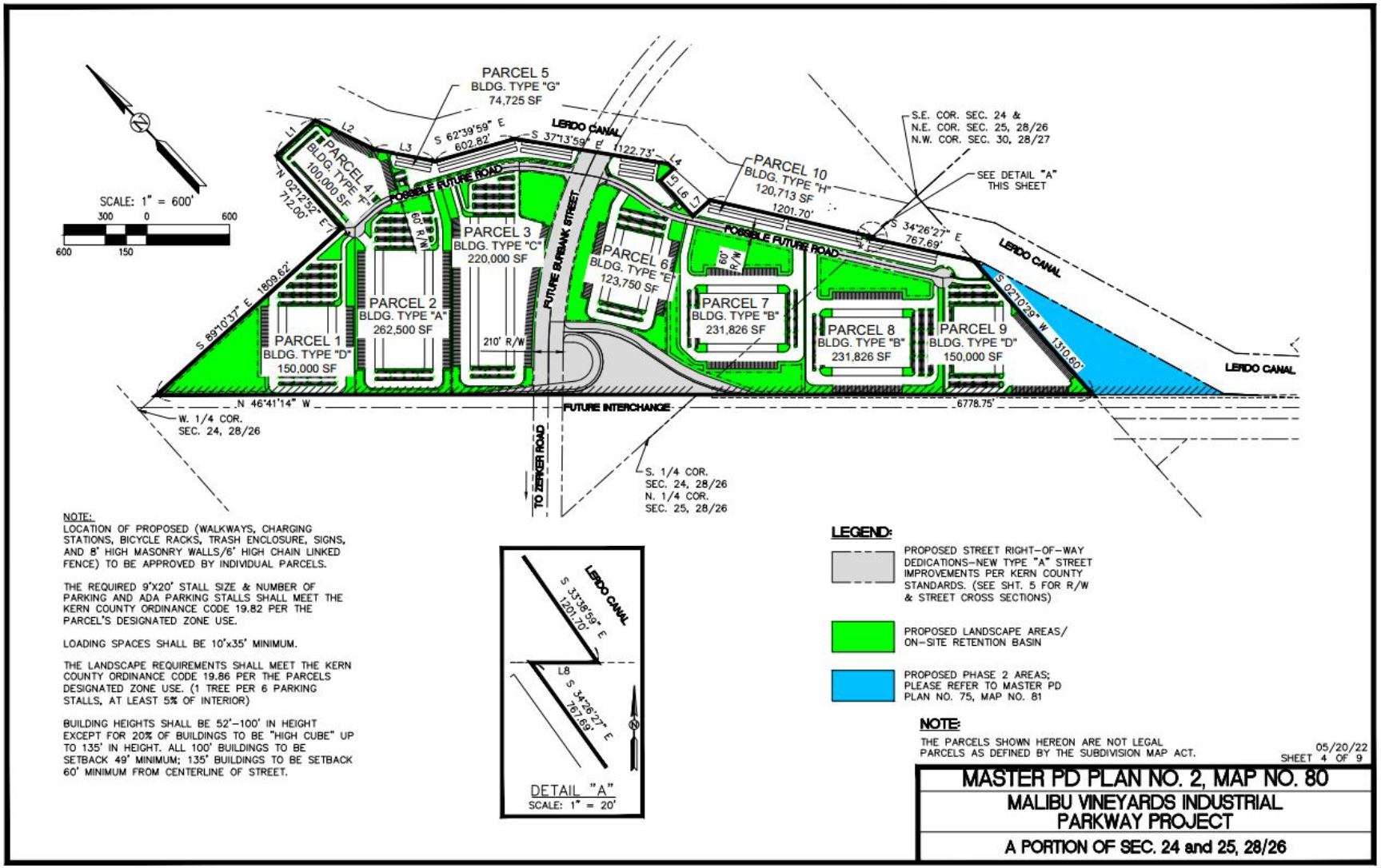


Figure 11, Phase 2 Site Plan 2, Map No. 80

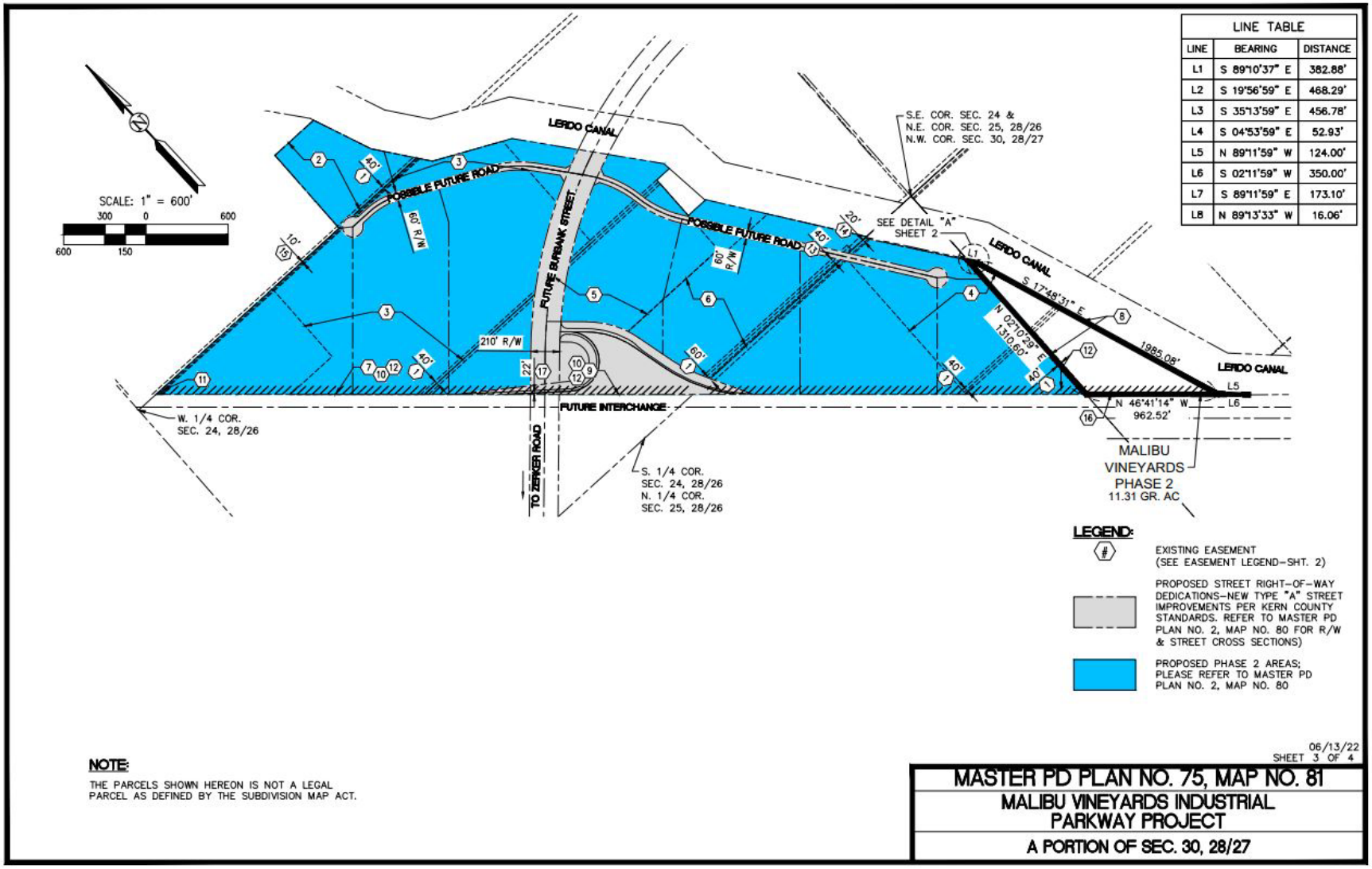


Figure 12, Phase 2 Site Plan 75, Map No. 81

Table 3 Summary for Phase 1 and Phase 2

Parcel	Building Area (sq ft)	Parking Stalls (cars)	Parking Stalls (trucks)
Phase 1			
1	646,800	556	174
2	646,800	556	174
3	771,600	486	424
4	738,000	346	406
5	571,200	276	300
6	248,640	212	162
7	147,000	160	300
8	771,600	416	424
9	771,600	416	424
10	174,720	260	52
11	174,720	270	52
12	231,826	166	100
13	576,000	260	152
14	771,600	416	424
Total	**7,242,106**	**4,796**	**3,568**

Parcel	Building Area (sq ft)	Parking Stalls (cars)	Parking Stalls (trucks)
Phase 2			
1	150,000	354	90
2	262,500	352	158
3	220,000	273	244
4	100,000	154	54
5	74,725	21	-
6	123,750	192	100
7	231,826	166	92
8	231,826	324	92
9	150,000	294	94
10	120,713	27	-
Total	**1,665,340**	**2,157**	**924**

Project Overview

The proposed project would be fully built out over a period of 10 to 20 years depending on market demand and beginning as early as 2023, if approved. It would expand the global e-commerce fulfillment services market in Kern County, which is dependent upon warehousing and shipping capabilities to get products transported in the shortest amount of time. The project would provide 5,000 to 6,000 full-time equivalent jobs upon full buildout of both Phases 1 and 2.

The Malibu Vineyards Industrial Parkway Project requests approval of the following applications by the County:

1. General Plan Amendment No. 9, Map No. 80 to change County General Plan Map Code 8.1 (Intensive Agriculture) to 7.2 (Service Industrial); (193.33 Acres)

2. General Plan Amendment No. 23, Map No. 81 to change the Metropolitan Bakersfield General Plan Map Code R-IA (Intensive Agriculture) to SI (Service Industrial); (545.15 Acres)
3. Zone Change No. 13, Map No. 80 to change zoning from A (Exclusive Agriculture) district to M-2 PD (Medium Industrial, Precise Development) district; (193.33 Acres)
4. Zone Change No. 92, Map No. 81 to change zoning from A (Exclusive Agriculture) district to M-2 PD (Medium Industrial, Precise Development) district; (545.15 Acres)
5. Precise Development Plans for the following maps:
   a. No. 2, Map 80; (193.33 Acres)
   b. No. 74, Map 81; (533.84 Acres)
   c. No. 75, Map 81; (11.31 Acres)

Site Access and Internal Circulation

Access to Phase 1 of the project site would include Imperial Avenue and Burbank Street. The Phase 2 location is currently isolated between the SR 99 and the Lerdo Canal and would require development of a future Burbank Street arterial or future expressway across one or both of these features to facilitate access. See attached Precise Development Plans, **Figure 10, Figure 11, and Figure 12,** above, for detail about the proposed location and size of rights-of-way for future development of transportation corridors.

The Project Proponent would develop roads adjacent to, and through the project site, in accordance with Kern County standards for project access including development of future arterial segment of Burbank Street, local streets, expressway, and interchange. Adjacent roads would be developed to half-width standards and roads through the site would be developed to full-width standards. In addition, the project would develop local roads internal to the project to facilitate project access and internal circulation. Local roads would provide access to truck drive aisles and parking areas associated with each building. The California Department of Transportation (Caltrans) will be consulted to provide input on any State highway upgrades needed for the project.

Site Security

As part of the project, temporary construction lighting may be required, and permanent lighting at the proposed industrial park and warehouse facility would include interior lighting, signage, and exterior security and safety lighting. Project lighting would meet Kern County dark sky requirements in Zoning Ordinance Chapter 19.81 - Outdoor Lighting Dark Skies and conform to lighting and glare-reducing measures required by County development standards. In addition, six-foot masonry and/or six-foot chain link fencing would be installed per the lessee's request at build out of the project phases.

Landscaping and Irrigation

Each building parcel would feature associated landscaping, generally along road frontages, driveway entries, and parking areas. Landscaping would conform to Kern County standards. See **Figure 10**, *Phase 1 PD Plan 74, Map No. 81* and **Figure 11**, *Phase 2 PD Plan 2, Map No. 80*, above, for illustrations.

Stormwater Management and Drainage Design

Stormwater would be collected via on-site retention basins and conveyed through an onsite drainage system to facilitate stormwater infiltration, retention, and metered discharge, emulating pre-development conditions. The sump drainage system would be constructed under Phase 2 and would comprise 11.31 acres of the project site.

Utilities

The project site is generally lacking in domestic utilities, which would need to be developed in conjunction with the proposed project. The project proponent is planning on the installation of solar panels on buildings and parking areas for power and installation of on-site Tiered vehicle chargers for project and employee vehicles.

Water and Wastewater

Water service would be provided by Oildale Mutual Water Company (OMWC). Off-site improvements would include extension of OMWC's six-inch domestic water line and 12-inch non-potable water line from Quinn Road along Imperial Avenue to the southeast corner of the proposed project. To facilitate water service, OMWC would need to annex the project area into its service area. The proposed annexation would involve approximately 739 acres. The annexation would need to be considered and approved by OMWC and the Kern County Local Agency Formation Commission in order to serve the project.

Wastewater collection would be provided by North of River Sanitary District No. 1. The nearest sewer trunk is a 36-inch line in Norris Road approximately three miles southeast from the project site. A new sewer trunk would be installed from the existing 36-inch line to the future intersection of Imperial Avenue at Endes Street via Coffee Road and 7th Standard Road. In addition, Phase 1 would require installation of a sewer lift station to reach the new sewer trunk.

Other Utilities

Electric services would be provided by Pacific Gas and Electric Company (PG&E). The proposed project would involve construction of a PG&E electrical substation and distribution system along with solar panels and Tiered vehicle chargers.

Gas services would be provided by Southern California Gas Company (SoCal Gas). The project would include a connection to the existing facilities in Petrol Road, 0.5 mile south of the project, a new natural gas pressure reducing station, as well as gas main extension and distribution laterals within the project site.

Telephone services would be provided by AT&T and cable would be provided by Spectrum.

Operational Water Requirements

The proposed project's operational water consumption is expected to be approximately 0.5-acre-foot per year to be used for toilets and hand washing facilities and fire protection.

Construction Activities

A specific construction schedule has not been identified for the project; and the schedule is likely to be driven by market demand. Project construction is anticipated to begin as early as 2023, with initial grading and infrastructure for the development of Phases 1 and 2 (estimated 18 years of site construction with a 46-year buildout maximum). Each parcel has the potential to be individually developed with buildout of Phase 1 anticipated by 2068. Phase 2 is expected to be developed concurrently beginning as early as 2023 (estimated 8 years of site construction with 23-year buildout maximum), with buildout by 2045.

The on-site construction workforce will consist of laborers, craftsmen, supervisory personnel, support personnel, and construction management personnel. The on-site construction workforce for the project is expected to peak at 300 individuals, however, the average daily workforce is expected to be 200 individuals on-site during construction.

Construction activities would be conducted consistent with Kern County Code of Ordinances, Title 8, Chapter 8.36.020 (Noise Control) regarding hours of construction or as approved by Kern County. Construction of the proposed project would include the following activities:

- Site preparation
- Access and internal circulation roads
- Grading and earthwork
- Concrete foundations
- Structural steel work
- Electrical/instrumentation work
- Stormwater management facilities
- Architecture and landscaping

Site Preparation, Earthwork and Construction Control Measures

Construction would involve grading and excavation for the building foundations, building construction, architectural coating, and paving activities. Approximately 3000 cubic yards per acre would be graded.

Construction Water Use

Water would be required during the construction phase for such activities as dust suppression, soil compaction, and grading. Water may also be used at points of ingress/egress to minimize the tracking of dirt off-site onto local roadways from construction vehicles. Water used for construction purposes would be from on-site wells. Bottled water would be provided to workers during construction.

Additionally, on-site restroom facilities for the construction workers would be provided by portable units to be serviced by licensed providers; no connection to a public sewer system is required for project construction, and therefore, water for such purposes is not required.

Orderly development would commence from the southerly portions of the site to the northerly due to accessibility from existing infrastructure. Improved circulation would follow with the progression of development.

Construction activities for the proposed project are anticipated to require approximately six acre-feet of water. During the construction phase, and operations water for the project will be supplied by OMWC.

1.4. Project Objectives

The project proponent has identified the following objectives for the project:

- Reduce the current unemployment rate in Kern County of 10.8 percent by increasing the amount of square footage for new businesses and increase job opportunities. Distribution and fulfillment centers maintain a high rate of employment.
- Support local budgets by replacing lost tax revenue from closed traditional brick and mortar retail locations with new tax revenues generated by industrial buildings.
- Meet the continued and expanding demand of the global e-commerce fulfillment services market that depend on warehousing and shipping capabilities to get products transported in the shortest amount of time. This market was valued at $69.68 billion in 2019.
- Generate large and dependable financial benefits to the County of Kern through annual property taxes upon full buildout.
- Generate tax revenue and boost the allocation of resources to improve infrastructure, utilities and public services throughout the county.

1.5. Proposed Discretionary Actions/Required Approvals

Construction and operation of the project may require the following discretionary actions and approvals. These actions/approvals are potentially required and do not necessarily represent a comprehensive list of all possible discretionary permits/approvals required. Other additional permits or approvals from responsible agencies may be required for the proposed project.

Federal

U.S. Fish and Wildlife Service (USFWS)

United States Army Corps of Engineers

- Jurisdictional delineation
- Section 404 Permit, if necessary

State

California Department of Fish and Wildlife (CDFW)

- Section 1600 et seq. permits (Streambed Alteration Agreements), if required
- Section 2081 Permit (state-listed endangered species)

California Department of Transportation (Caltrans)

- Right-of-Way Encroachment Permit
- Oversized Loads Permit

State Water Resources Control Board

- National Pollutant Discharge Elimination System Construction General Permit

Local

County of Kern

- Certification of Final Environmental Impact Report
- Adoption of 15091 Findings of Fact and 15093 Statement of Overriding Considerations
- Adoption of Mitigation Measures Monitoring and Program
- Approval of proposed Zone Change Cases
- Approval of proposed General Plan Amendments
- Approval of proposed Precise Development Plans
- Approval of Grading Permits
- Approval of Building Permits
- Fire Safety Plan

Kern County Local Agencies Formation Commission

- Annexation of approximately 740 acres, inclusive of the project site, into OMWC's service area.

Oildale Mutual Water District

- Annexation of approximately 740 acres, inclusive of the project site, into OMWC's service area.
- Approval of a Water Supply Assessment

San Joaquin Valley Air Pollution Control District

- Authority to Construct
- Fugitive Dust Control Plan

City of Shafter Planning Department

- Sphere of Influence Amendment
- Municipal Services Review Update
- CEQA EIR
- Annexation w/ GPA

2. Kern County Environmental Checklist Form

2.1. Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "potentially significant impact" as indicated by the Kern County Environmental Checklist on the following pages.

☒ Aesthetics	☒ Agricultural and Forestry Resources	☒ Air Quality
☒ Biological Resources	☒ Cultural Resources	☒ Energy
☒ Geology and Soils	☒ Greenhouse Gas Emissions	☒ Hazards and Hazardous Materials
☒ Hydrology and Water Quality	☒ Land Use and Planning	☐ Mineral Resources
☒ Noise	☒ Population and Housing	☒ Public Services
☒ Recreation	☒ Transportation and Traffic	☒ Tribal Cultural Resources
☒ Utilities/Service Systems	☐ Wildfire	☒ Mandatory Findings of Significance

2.2. Determination

(To be completed by the Lead Agency)

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☒ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect (a) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (b) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENT IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature: /s/ Date: August 3, 2022

Matthew Hall, Supervising Planner — Malibu Vineyards Industrial Parkway Project

3. Evaluation of Environmental Impacts

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
4. Negative Declaration: "Less than Significant with Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less-than-Significant Impact." The lead agency must describe the mitigation measure and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section XVII, "Earlier Analyses," may be cross-referenced).
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration, Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
    a. Earlier Analysis Used. Identify and state where they are available for review.
    b. Impacts Adequately Addressed. Identify which effects from the above checklist where within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
    c. Mitigation Measures. For effects that are "Less than Significant with Mitigation Incorporated," describe the mitigation measures that were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
9. The explanation of each issue should identify:
    a. The significance criteria or threshold, if any, used to evaluate each question; and
    b. The mitigation measure identified, if any, to reduce the impact to a less than significant level.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than Significant Impact	No Impact

I. Aesthetics

Would the project:

a.	Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b.	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c.	In nonurbanized areas, substantially degrade the existing visual character or quality of the site and its surroundings? (Public views are those that are experienced from public accessible vantage points) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☒	☐	☐	☐
d.	Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?	☒	☐	☐	☐

RESPONSES:

(a) The project site consists of agricultural land, with a portion of the project site currently being utilized for growing table grapes. The aesthetic features of the existing visual environment in the project area are relatively uniform, flat landscapes with various agricultural fields consisting of vineyards, orchards, and cover crops. Lerdo Canal runs through the project site, however, due to an earthen berm, is not visible from SR 99, which is the prominent road nearest the project site, except where the canal passes under SR 99. The project site is generally surrounded by agricultural land and rural residential dwellings. The unincorporated community of Cawelo is located north of the project site and consists predominantly of intensive agricultural and industrial uses in addition to some suburban residential uses. Agricultural, industrial, and suburban residential uses in the unincorporated community of Saco, a census-designated place in Kern County, are also located south of the project site. No scenic vistas are associated with the project site or its vicinity. Therefore, the project would have no impact on scenic vistas and further analysis in an EIR is not required.

(b) The nearest highway to the project site SR 99, immediately adjacent to the western boundary, is not classified as a National Scenic Byway or Designated State Scenic Highway, nor considered a sensitive corridor regarding visual resource issues. In addition, the Caltrans California Scenic Highway Mapping System further confirms there are no designated or eligible state scenic highways within the vicinity of the project site (Caltrans 2021). In addition, the project site is substantially lacking in scenic resources, and does not feature any trees, rock outcroppings, or historic buildings.

Therefore, there are no designated or eligible state scenic highways within the vicinity of the project site, and the project would have no impact to scenic resources, trees, rock outcroppings, and historic buildings within a state scenic highway. No impact is anticipated and further analysis in an EIR is not required.

(c) Refer to Response (a), above, for a description of the existing landscape character. There is a potential that the proposed project would substantially change views from adjacent SR 99, and other public roads located in the surrounding area. Placement of the light-medium industrial structures and warehouses on the project site would alter the existing character of the area by interrupting the expansive agricultural viewshed from SR 99 with increased development and massing. Residents and travelers on adjacent roads would observe alterations to the existing landscape. Changes to the visual quality and character of the project site would be potentially significant and will be further evaluated in an EIR.

(d) The existing project site is composed of vineyards and related agricultural features and is not a source of light or glare. The unincorporated community of Cawelo is located north of the project site and consists predominantly of intensive agricultural and industrial uses in addition to some residential uses. Agricultural, industrial, and residential uses in the unincorporated community of Saco, a census-designated place in Kern County, are also located south of the project site. The existing agricultural land and residences in the project vicinity generate a minimal amount of light and glare, primarily from building interior and exterior lighting. As part of the project, temporary construction lighting may be required, and permanent lighting at the proposed industrial park and warehouse facility would include interior lighting, signage, and exterior security and safety lighting. Project lighting would meet Kern County dark sky requirements in Zoning Ordinance Chapter 19.81 - Outdoor Lighting Dark Skies and conform to lighting and glare-reducing measures required by County development standards. Due to the change in land use, impacts related to light and glare from the proposed project would be potentially significant, however, light and glare will be further evaluated in an EIR.

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than Significant Impact	No Impact
II.	**Agriculture and Forest Resources**				
	Would the project:				
a.	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use?	☒	☐	☐	☐
b.	Conflict with existing zoning for agricultural use or a Williamson Act Contract?	☒	☐	☐	☐
c.	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	☐	☐	☐	☒
d.	Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e.	Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☒	☐	☐	☐
f.	Result in the cancellation of an open space contract made pursuant to the California Land Conservation Act of 1965 or Farmland Security Zone Contract for any parcel of 100 or more acres (Section 15205(b)(3) Public Resources Code)?	☐	☐	☐	☒

RESPONSES:

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and the forest carbon

measurement methodology provided in the Forest Protocols adopted by the California Air Resources Board (CARB).

(a) The project site consists of agricultural land, with a portion of the project site currently being utilized for growing table grapes. There is no land that meets the requirements for Unique Farmland, or Farmland of Statewide Importance located within the project site. However, approximately 314.31 acres in the proposed project area would meet the requirements for prime farmland if undeveloped and water for irrigation is available (McIntosh & Associates 2020; DOC 2019). In addition, project conversion of agriculture to developed uses may indirectly impact other designated farmland. Project impacts associated with the conversion of designated farmland would be potentially significant and will be further evaluated in an EIR.

(b) Implementation of the project would require all project parcels to have their existing zoning changed from A (Exclusive Agriculture) to M-2 PD (Medium Industrial, Precise Development), thereby converting an agricultural zone to a non-agricultural zone. The project site does not contain lands that are under Williamson Act Contracts. The area to the northeast of Phase 2 of the project is under a Williamson Act Contract. As such, there would be no direct impacts to Williamson Act Contract lands; however, project conversion of agriculture to developed uses may indirectly impact Williamson Act Contract lands. Project impacts associated with conflicts with existing zoning for agricultural use or a Williamson Act Contract would be potentially significant and will be further evaluated in an EIR.

(c) No lands affected by the proposed project are zoned or used as forest land, timberland, or timberland production. Therefore, the project would not conflict with existing zoning for, or cause the rezoning of, forest land, timberland, or timberland zoned for timberland production. Therefore, there would be no impact and further analysis in an EIR is not required.

(d) The project site is not situated on forest or timberland and is not located near any such areas that are currently under production. There is no land in the vicinity of the project site that is zoned as forest land, timberland, or lands zoned for timberland production. Therefore, there would be no impact related to the loss of forest land or conversion of forest land to non-forest use, and further analysis in an EIR is not required.

(e) The project site is not designated as forest land and forest land or timberlands do not occur in the project vicinity. The project would directly convert land currently cultivated, zoned, and classified as Prime Farmland to non-agricultural uses. Project impacts associated with the conversion of farmland, to non-agricultural would be potentially significant and use will be further evaluated in an EIR.

(f) The project site is not subject to an open space contract made pursuant to the California Land Conservation Act of 1965 or the Farmland Security Zone Contract. As stated above, the project site is not under a Williamson Act Contract. Therefore, the project would not result in the cancellation of an open space contract made pursuant to the California Land Conservation Act of 1965 or Farmland Security Zone Contract. No impact would occur, and no further evaluation is required in an EIR.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than Significant Impact	No Impact

III. Air Quality

Where available, the significance criteria established by the applicable air quality management or air pollution control district shall be relied upon to make the following determinations. Would the project:

a.	Conflict with or obstruct implementation of the applicable air quality plan?	☒	☐	☐	☐
b.	Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or state ambient air quality standard? Specifically, would implementation of the project exceed any of the following adopted thresholds:				
	i. San Joaquin Valley Unified Air Pollution Control District:				
	Operational and Area Sources				
	Reactive organic gases (ROG): 10 tons per year.	☒	☐	☐	☐
	Oxides of nitrogen (NO_X): 10 tons per year.	☒	☐	☐	☐
	Particulate matter (PM_{10}): 15 tons per year.	☒	☐	☐	☐
	Stationary Sources - as Determined by District Rules				
	Severe nonattainment: 25 tons per year.	☒	☐	☐	☐
	Extreme nonattainment: 10 tons per year.	☒	☐	☐	☐
	ii. Eastern Kern Air Pollution Control District.				
	Operational and Area Sources				
	Reactive organic gases (ROG): 25 tons per year.	☐	☐	☐	☒
	Oxides of nitrogen (NO_X): 25 tons per year.	☐	☐	☐	☒
	Particulate matter (PM_{10}): 15 tons per year.	☐	☐	☐	☒
	Stationary Sources – as Determined by District Rules				
	25 tons per year.	☐	☐	☐	☒
c.	Expose sensitive receptors to substantial pollutant concentrations?	☒	☐	☐	☐
d.	Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☒	☐	☐	☐

RESPONSES:

(a) The project site is subject to air quality management plans promulgated by the San Joaquin Valley Unified Air Pollution Control District (SJVAPCD). The project would generate air emissions during both project construction and ongoing operations. Based on preliminary air quality analysis, short term construction-related emissions would be less than the SJVAPCD threshold levels for CO, SO_X, and $PM_{2.5}$, but would exceed thresholds for ROG, NO_X, and PM_{10}. In addition, long term operational emissions would exceed the SJVAPCD threshold levels for ROG and NO_X (McIntosh & Associates, Inc. 2021). Further analysis of the project's air quality impacts is warranted to confirm impacts and determine the feasible mitigation measures that could be imposed. Therefore, air quality impacts would be potentially significant and this issue will be further evaluated in an EIR.

(b) The project site is subject to emission thresholds established by SJVAPCD and is outside the area regulated by the Eastern Kern Air Pollution Control District. The proposed project would generate air emissions during both project construction and ongoing operations. As discussed above in response (a), short term construction-related emissions would exceed SJVAPCD significance thresholds for ROG, NO_X, and PM_{10}, and thus potentially contribute to cumulative air quality emissions.

Similarly, long term operations-related emissions would exceed SJVAPCD significance thresholds for ROG, and NOX. Further analysis of the project's air quality impacts is warranted to confirm the project's contribution to cumulative impacts, and to determine feasible mitigation measures that could be imposed. SJAVPCD ROG and NOX criteria pollutants would be potentially significant. and this issue will be further evaluated in an EIR.

(c) The proposed project is located in an area that is sparsely populated. The nearest sensitive receptor is a rural residential dwelling located approximately 0.07 mile to the west of the project site. The project site is surrounded by agricultural uses or undeveloped land on all sides in the proximate vicinity and no known non-residential sensitive receptors are located within two miles of the project site. However, the project site is located immediately adjacent to SR 99. Operation of the proposed project has the potential to expose employees at the future warehouse distribution facility to pollution generated by traffic on surrounding roadways. Impacts to sensitive receptors require additional analysis; therefore, impacts to sensitive receptors via exposure to substantial pollutant concentrations would be potentially significant and will be further evaluated in an EIR.

(d) The SJVAPCD has identified some common types of facilities that have been known to produce odors in the San Joaquin Valley Air Basin. These are presented in Table 6 (Screening Levels for Potential Odor Sources) of SJVAPCD's Guidance for Assessing and Mitigating Air Quality Impacts (GAMAQI). A preliminary review of the criteria indicate that the proposed uses/activities are not generally associated with sources of nuisance according to SJVAPCD criteria (SJVAPCD 2015). Possible other emissions, including odors would be potentially significant and will be further evaluated in an EIR.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than Significant Impact	No Impact

IV. Biological Resources

Would the project:

a.	Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☒	☐	☐	☐
b.	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☒	☐	☐	☐
c.	Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☒	☐	☐	☐
d.	Interfere substantially with the movement of any native resident or migratory fish or wildlife species, or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☒	☐	☐	☐
e.	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☒	☐	☐	☐
f.	Conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan?	☒	☐	☐	☐

A preliminary biological report was prepared for the project site by MESA Biological LLC (2020). The analysis herein is based substantially on the information from that report.

RESPONSES:

(a) The project site consists of agricultural land, with a portion of the project site currently being utilized for growing table grapes. The biological field surveys indicate no sign of occupation of candidate, sensitive, or special-status plant and animal species on-site. Furthermore, due to the isolated nature

of the site, historical land use and active disturbance, lack of nearby source populations of native special status species, and proximity to development/activity, the potential for occurrence of many of the state or federal listed or special-status species is considered unlikely (MESA 2020). However, potential impacts to candidate, sensitive, or special-status species will be further evaluated in an EIR.

(b) The project site is in active agricultural production (table grapes/vineyard) and based on biological field surveys no undisturbed habitat exists within the site. No sign of any bed, bank, channel, or constituent elements were present at the project site that would indicate wetlands or wetland features present. No evidence of potential wetland habitat was present on-site near the Lerdo Canal, which divides the project site. However, impacts related to riparian habitat or other sensitive natural community, including those identified in local or regional plans, or policies would be potentially significant and will be further analyzed in an EIR.

(c) Potential federal or state-protected water-based resources such as streams and washes could be present on the project site and might be impacted by project construction activities. No sign of any bed, bank, channel, or constituent elements were present at the project site that would indicate wetlands or wetland features present at the site. As stated above in response (b), the Lerdo Canal divides the project site. No evidence of potential wetland habitat was present on-site near the canal. However, impacts will be further evaluated in an EIR.

(d) No source of refuge or nursery site for wildlife or fish are on or adjacent to the project site. Given the project location, proximity to urban development and predominantly developed lands or land in active agriculture in the vicinity, the area is not known to support migratory or natural wildlife movement. In addition, the Lerdo Canal through the project site and adjacent SR 99 are substantial barriers to terrestrial wildlife movement. However, project construction and operation may remove foraging habitat and impacts would be potentially significant. Impacts to wildlife movement will be further evaluated in an EIR.

(e) There are no known local policies or ordinances protecting biological resources located within the project site and vicinity. The County tree protection requirements focus on street trees, which are not on the project site. Nonetheless, the EIR will further evaluate the project's consistency with local policies in the County General Plan regarding protection of biological resources.

(f) The proposed project site is not located within an adopted Habitat Conservation Plan Area; however, it is located within the Kern County Valley Floor Habitat Conservation Plan, which is still in First Public Draft form. Should this Habitat Conservation Plan be adopted prior to project approval, it would apply to the project site. Therefore, impacts would be potentially significant and will be evaluated further in an EIR.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than Significant Impact	No Impact

V. Cultural Resources

Would the project:

a.	Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5?	☒	☐	☐	☐
b.	Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5?	☒	☐	☐	☐
c.	Disturb any human remains, including those interred outside of formal cemeteries?	☒	☐	☐	☐

RESPONSES:

(a) and (b) Development of the proposed project would require demolition of existing structures, and ground disturbance for site grading and installation of the proposed industrial park structures, and all necessary underground utilities. The proposed project could potentially have a significant impact on historical or cultural resources, including resources that are undiscovered or that may be buried underground. A site-specific cultural resources survey will be conducted, to determine presence or potential presence of archaeological and historical resources and identify potential impacts to historical and/or archaeological cultural resources and to formulate avoidance or mitigation measures, if applicable. Potentially significant impacts to historical and archaeological resources will be further evaluated in an EIR.

(c) The project site has been heavily disturbed by previous agricultural activity and is not known to be associated with human remains. The project has the potential to disturb human remains during construction if present. Therefore, this issue will be further evaluated in an EIR.

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than Significant Impact	No Impact
VI. Energy					
Would the project:					
a.	Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☒	☐	☐	☐
b.	Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☒	☐	☐	☐

RESPONSES:

(a) Construction of the project would involve on-site energy demand and consumption related to use of oil in the form of gasoline and diesel fuel for construction worker vehicle trips, hauling and materials delivery truck trips, and operation of off-road construction equipment. In addition, diesel-fueled portable generators may be necessary to provide additional electricity demands for temporary on-site lighting, welding, and for supplying energy to areas of the sites where energy supply cannot be met via a hookup to the existing electricity grid.

The project would be served by PG&E for electricity SoCal Gas for natural gas and would also be required to include solar rooftop and/or common field arrays consistent with the Kern County General Plan. Operation and maintenance facilities associated with the project would require electricity for interior and exterior building lighting, heating, ventilation, and air conditioning (HVAC), electronic equipment, machinery, appliances, security systems, etc. Site maintenance activities during operations could involve the use of electric or gas-powered equipment. In addition to on-site energy use, the project would also result in transportation energy use associated with employee vehicle trips. The proposed project could have potentially significant impacts due to wasteful, inefficient, or unnecessary consumption of energy resources. Therefore, this topic will be further discussed and analyzed in an EIR.

(b) The proposed project would be required to comply with the Kern County General Plan and Energy Element therein. As required by the State of California, the proposed project would also be required to comply with the State's plans and policies regarding energy efficiency. Further analysis is warranted to provide a broader assessment of the project's potential significance in terms of obstructing implementation of important State and County objectives for renewable energy of energy efficiency. Therefore, this topic will be discussed and analyzed in an EIR.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than Significant Impact	No Impact

VII. Geology and Soils

Would the project:

a.	Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
	i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
	ii. Strong seismic ground shaking?	☒	☐	☐	☐
	iii. Seismic-related ground failure, including liquefaction?	☒	☐	☐	☐
	iv. Landslides?	☐	☐	☐	☒
b.	Result in substantial soil erosion or the loss of topsoil?	☒	☐	☐	☐
c.	Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☒	☐	☐	☐
d.	Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☒	☐	☐	☐
e.	Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems in areas where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒
f.	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☒	☐	☐	☐

RESPONSES:

(a)(i) According to the Hazardous Materials Evaluation Report prepared by McIntosh & Associates, Inc. (2020), there are no mapped areas that have Fault Zones on the proposed project site. In addition, no known surface or subsurface faults have been mapped transecting any of the parcels comprising the proposed project. The nearest fault zone is the Premier Fault Zone and it is located approximately 6,770 feet east of the northeast corner or the proposed project (on James Road 150 feet east of SR 65). The largest fault in the area, the Kern Front fault, is located approximately 3.7 miles east of the east boundary of the proposed project. The nearest active major fault is the Helendale-South Lockhart fault, located approximately 9.2 miles northeast of the project site (McIntosh 2020a). Impacts related to surface fault ruptures, therefore, are not anticipated. In addition, construction of the project would be subject to all applicable ordinances of the Kern County Building Code (Chapter 17.08), include standards related to seismic hazards. Kern County has adopted the California Building Standards Code (CBC), which imposes substantially the same requirements as the International Building Code (IBC). Therefore, impacts would be less than significant.

(a)(ii) Due to the location of active faults in the general region, strong seismic ground shaking could occur at the project site, resulting in damage to both above and below ground structures and other site improvements, if not properly designed to withstand strong ground shaking. Construction of the proposed project would be subject to all applicable ordinances of the Kern County Building Code (Chapter 17.08). Kern County has adopted the CBC which imposes substantially the same requirements for design to resist strong ground motions as the IBC. Adherence to applicable regulations would minimize the potential impacts associated with the proposed project. Nonetheless, impacts will be further evaluated in an EIR.

(a)(iii) Seismically induced liquefaction occurs when loose, water-saturated sediments of relatively low density are subjected to cyclic shaking that causes soils to lose strength or stiffness because of increased pore water pressure. Liquefaction generally occurs when the depth to groundwater is less than 50 feet. Based on review of available groundwater data in the site vicinity, groundwater in the site vicinity is expected to be more than 50 feet below ground surface (Krazan 2020). Thus, the potential for liquefaction at the surface is low. Structures constructed as part of the project would be required by State law to be constructed in accordance with all applicable IBC and CBC earthquake construction standards, including those relating to soil characteristics. Nonetheless, the potential for substantial adverse effects to the project due to seismic-related ground failure, including liquefaction, will be examined in an EIR.

(a)(iv) The project site is located in a relatively flat-lying plain, where landslides are not likely. Impacts related to landslides are not anticipated to occur or pose a hazard to the project or surrounding area, and are considered to have no impact, therefore, further analysis in an EIR is not required.

(b) Implementation of the proposed project would result in the development of approximately 740 acres that are currently active grape vineyards. Therefore, impacts associated with soil erosion and loss of topsoil during or following construction would be potentially significant. This issue will be further evaluated in an EIR.

(c) Lateral spreading is the horizontal movement or spreading of soil toward an open face. Lateral spreading may occur when soils liquefy during an earthquake event, and the liquefied soils with overlying soils move laterally to unconfined spaces. Subsidence is the sudden sinking or gradual downward settling of the earth's surface with little or no horizontal movement. Subsidence is caused

by a variety of activities, which include, but are not limited to, withdrawal of groundwater, pumping of oil and gas from underground, the collapse of underground mines, liquefaction, and hydro-compaction. Based on the subsurface conditions encountered at the boring locations including the lack of a static ground water table, liquefaction potential at the project site is low. However, within the vicinity of the canal, shallow groundwater levels may be encountered (Krazan 2020).

The project would be required to adherence to applicable policies and recommendations outlined in applicable ordinances of the Kern County Building Code (Chapter 17.08). Structures constructed as part of the project would be required by state law to be constructed in accordance with all applicable IBC and CBC earthquake construction standards, including those relating to soil characteristics. However, impacts would be potentially significant and the potential for substantial adverse effects to the project due to on- or off-site lateral spreading, subsidence, liquefaction, or collapse, will be examined further in an EIR.

(d) Expansive soils are fine-grained soils (generally high plasticity clays) that can undergo a significant increase in volume with an increase in water content and a significant decrease in volume with a decrease in water content. Changes in the water content of a highly expansive soil can result in severe distress to structures constructed on or against the soil. The proposed project would be designed to comply with applicable building codes and structural improvement requirements to withstand the effects of expansive soils; however, this impact would be potentially significant and will be further evaluated in an EIR.

(e) The project would be connected to the sewer system for wastewater disposal and would not require a septic system or alternative wastewater system. Therefore, the project would not result in impacts associated with soils that are incapable of supporting septic tanks and alternative wastewater disposal systems. Further analysis in an EIR is not required.

(f) Kern County is rich in paleontological resources. If sensitive paleontological formations are located underground on the project site, ground disturbance could result in impacts to paleontological resources. A paleontological study will be conducted to determine the underlying formations and potential for fossil discoveries throughout the project site due to the consideration that impacts may be potentially significant. This issue will be further evaluated in an EIR.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than Significant Impact	No Impact

VIII. Greenhouse Gas Emissions

Would the project:

a.	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☒	☐	☐	☐
b.	Conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☒	☐	☐	☐

RESPONSES:

(a) Greenhouse gas (GHG) emissions emitted by human activity are implicated in global climate change or global warming. The principal GHGs are CO_2, methane (CH_4), NO_X, ozone, water vapor, and fluorinated gases. The temporary construction activities associated with the proposed project, which would involve operation of heavy off-road equipment, on-road trucks (for deliveries and hauling), and construction worker commute trips, would generate GHG through exhaust emissions. The nature of the proposed project as an industrial park with truck loading docks and warehouses would also generate further GHGs through its use as a hub for diesel trucks and equipment. The project's GHG emissions generated during construction and operation of the project will be quantified and further evaluated in an EIR. Potential for significant environmental impacts will be examined through the project's consistency with GHG reduction plans, programs or regulations, as outlined in the next response.

(b) There are numerous state plans, policies, and regulations adopted for the purpose of reducing GHG emissions. Statewide plans and regulations such as GHG emissions standards for vehicles (Assembly Bill 1493), the Low Carbon Fuel Standard, and regulations requiring an increasing fraction of electricity to be generated from renewable sources are being implemented at the statewide level; as such, these do not apply to individual development projects. Mandated by Senate Bill (SB) 32, CARB adopted the 2017 Update to its 2008 Scoping Plan, which is the State's plan to achieve the 40 percent reduction in GHG emissions from 1990 levels by 2030. Guided by legislative direction, the Scoping Plan identifies actions identified to reduce overall GHG emissions in California. It notes that transportation, primarily on-road travel, is the single largest source of CO_2 emissions in the State (CARB 2017).

As discussed above, project buildout would generate GHG emissions through the burning of fossil fuels or other emissions of GHGs, thus potentially contributing to cumulative impacts related to climate change. Heavy equipment operation, truck deliveries, and construction worker commute trips associated with construction and operation of the proposed project would generate GHGs. The project's potential GHG impacts would be potentially significant and the potential GHG offsets and impacts resulting from operation of the project will be examined in an EIR, with respect to the objectives of statewide programs to reduce GHGs associated with energy generation.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than Significant Impact	No Impact

IX. Hazards and Hazardous Materials

Would the project:

a.	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☒	☐	☐	☐
b.	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☒	☐	☐	☐
c.	Emit hazardous emissions or involve handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
d.	Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
e.	For a project located within the adopted Kern County Airport Land Use Compatibility Plan, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☒	☐	☐	☐
f.	Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?	☒	☐	☐	☐
g.	Expose people or structures, directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	☐	☐	☒	☐
h.	Would implementation of the project generate vectors (flies, mosquitoes, rodents, etc.) or have a component that includes agricultural waste? Specifically, would the project exceed the following qualitative threshold: The presence of domestic flies, mosquitoes, cockroaches, rodents, and/or any other vectors associated with the project is significant when the applicable enforcement agency determines that any of the vectors:				

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than Significant Impact	No Impact
i. Occur as immature stages and adults in numbers considerably in excess of those found in the surrounding environment; and	☒	☐	☐	☐
ii. Are associated with design, layout, and management of project operations; and	☒	☐	☐	☐
iii. Disseminate widely from the property; and	☒	☐	☐	☐
iv. Cause detrimental effects on the public health or well-being of the majority of the surrounding population.	☒	☐	☐	☐

RESPONSES:

(a) Although field equipment used during construction activities could contain various hazardous materials (i.e., hydraulic oil, diesel fuel, grease, lubricants, solvents, adhesives, paints, etc.), these materials are not considered to be acutely hazardous and would be used in accordance with the manufacturer's specifications and all applicable regulations. In addition, hazardous fuels and lubricants used on field equipment would be subject to a Construction Waste Management Plan and, if required, a Spill Prevention, Containment and Countermeasure Plan.

The proposed project would be subject to all local, State, and federal laws pertaining to the use of hazardous materials on-site and would be subject to review by the Kern County Environmental Health Services Division. Through the review process, the project would be required to submit a complete list of all materials used on-site, how the materials would be transported and stored, and in what form they would be used to maintain safety and prevent possible environmental contamination or worker exposure. During construction of the proposed project, Material Safety Data Sheets (MSDS) for all applicable materials present at the site would be made readily available to on-site personnel. During construction of the facilities, non-hazardous construction debris would be generated and disposed of in approved facilities. During construction of the facility, human waste would be managed using portable toilets located at reasonably accessible on-site locations. However, impacts would be potentially significant and the impacts will be further addressed in an EIR.

(b) Construction activities would be temporary and are not are not anticipated to release hazardous materials or present significant hazards to construction workers, the general public, or the environment. Since the final uses for the site are currently unknown, the routine transport, use, or disposal of hazardous materials during operations activities is unknown. However, the proposed project would be subject to all local, State, and federal laws pertaining to the use of hazardous materials on-site and would be subject to review by the Kern County Environmental Health Services Division. Through the review process, the project proponent would be required to submit a complete list of all materials used on-site, how the materials would be transported and stored, and in what form they would be used. This would be recorded to maintain safety and prevent possible environmental contamination or worker exposure. This would include submission of MSDS for all applicable materials present at the site, and the MSDS would be made readily available to on-site personnel.

Impacts for the project would be potentially significant and potential impacts will be further evaluated in an EIR.

(c) The project site is not located within 0.25 mile of an existing or proposed school. The nearest schools include Norris Middle School, located approximately two miles south, and Norris Elementary School, located approximately 2.6 miles southwest of the project site. Therefore, no impact would occur as a result of the project, and further analysis in an EIR is not required.

(d) Based on a preliminary review of the Cortese List Data Resources, the proposed project is not located on a site which is included on a list of hazardous materials compiled pursuant to Government Code Section 65962.5 (McIntosh & Associates, Inc. 2020). In addition, based on review of the Department of Toxic Substances Control (DTSC) EnviroStor and the State Water Resources Control Board (SWRCB) GeoTracker databases, there are no hazardous materials sites located within 1,000 feet of the project site (DTSC 2021, SWRCB 2021). There would be no impacts due to the property not being listed on the Cortese List Data Resources database and project impacts will not be further evaluated in an EIR.

(e) The Kern County ALUCP covers operations at the Meadows Field Airport, which is located approximately 1.5 miles southeast of the project site. As shown in **Figure 7**, *Airport Land Use Compatibility Map*, a portion of the proposed project is located within the Extended Approach/Departure Zone and Adjacent to Runway (Area B-2) and Common Traffic Pattern (Area-C) of the Meadows Field Airport. Area B-2 is categorized as having significant noise and risk impacts, as aircrafts are commonly below 800 feet, and Area C is categorized as limited risk with frequent noise intrusion. Therefore, aircraft noise from the Meadows Field Airport has the potential to generate significant impacts due to excessive noise if the workforce on-site is partially located within Areas B-2 or -C of the Kern County ALUCP. Therefore, this impact is potentially significant and will be further evaluated in an EIR.

(f) As required by routine and standard construction specifications administered by Kern County, emergency access would be maintained throughout construction, and appropriate detours would be provided in the event of potential road closures. Therefore, no significant impacts related to impairment of the implementation of or physical interference with an adopted emergency response plan or emergency evacuation plan would occur during construction.

During operation, the proposed project would generate between 5,000 and 6,000 jobs. The size of the project's operational work force has the potential to generate significant traffic volumes during an emergency evacuation scenario that could complicate area-wide emergency evacuation efforts. Additionally, the size of the project's operational work force could impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan. Impacts on emergency response or evacuation plans would be potentially significant and will therefore be further assessed in an EIR.

(g) According to the California Department of Forestry and Fire Protection's (CalFire) California Fire Hazard Severity Zone Viewer, the project site and vicinity are not located within a Fire Hazard Severity Zone (CalFire 2020). The proposed project would be subject to design review and comply with applicable wildland fire management plans and policies established by the Kern County Fire Department. Therefore, impacts would be less than significant and do not require further evaluation in an EIR.

(h)(i. through iv.) The proposed project includes a request for land use entitlements necessary to allow the construction and operation of an industrial park. Vectors such as mosquitos and rodents may be associated with existing agricultural uses. Construction activities may result in the removal, or displacement of vectors (i.e., rodents disseminating from the site during project construction). As the project would convert the site from agricultural use to industrial uses, the project would reduce overall vector potential in the long-term. Most operational activity would be conducted indoors limiting substantially limiting vector potential. On-site landscape areas associated with the project may provide refuge for mosquitos and other vectors and would be potentially significant. Impacts will be further evaluated in an EIR.

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than Significant Impact	No Impact

X. Hydrology and Water Quality

Would the project:

a.	Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	☒	☐	☐	☐
b.	Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☒	☐	☐	☐
c.	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
	i. result in substantial erosion or siltation on- or off-site;	☒	☐	☐	☐
	ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☒	☐	☐	☐
	iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☒	☐	☐	☐
	iv. impede or redirect flood flows?	☒	☐	☐	☐
d.	In flood hazard, tsunami, seiche zones, risk release of pollutants due to project inundation?	☒	☐	☐	☐
e.	Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☒	☐	☐	☐

RESPONSES:

(a) Project construction activities have the potential to result in erosion, sedimentation, and discharge of construction debris, and could result in the discharge of wastewater and runoff at the project site. Project construction would encompass an area greater than one acre and would be subject to a General Construction Permit under the National Pollution Discharge Elimination System (NPDES) permit

program of the federal Clean Water Act. A Stormwater Pollution Prevention Plan (SWPPP) would be implemented consistent with General Construction Permit requirements. The NPDES permit would require submittal of a Notice of Intent to the Regional Water Quality Control Board (RWQCB) prior to commencement of construction activities. Implementation of the SWPPP would begin with the commencement of construction and continue through the completion of the project. The objectives of a SWPPP are to identify pollution sources (such as sediment) that may affect the quality of stormwater discharge and to implement best management practices (BMPs) to reduce pollutants in stormwater during project construction until the site is stabilized.

Project design would also be guided by a Water Quality Management Plan to address the management of stormwater and related pollutants throughout the life of the project. Impacts would be potentially significant and will be further evaluated in an EIR.

(b) The project would use groundwater from on-site wells during construction. Potable water for project operation would be provided by the OMWC. A State Bill 610 Water Supply Assessment is being prepared for the proposed project to further evaluate water supply requirements for the proposed project. The project is anticipated to decrease water use when compared to existing agriculture operations; however, this impact will be further evaluated in an EIR.

(c)(i) Implementation of the proposed project would include the development of approximately 740 acres of new impervious surfaces, which could impact the existing drainage pattern of the area, increase the volume or rate of runoff thereby resulting in erosion or saltation on- or off-site. Impacts would be potentially significant and will be further evaluated in an EIR.

(c)(ii) Construction and operational activities associated with the proposed project would alter existing drainage conditions and create impervious surfaces that would have the potential to result in an increase in the rate or amount of surface runoff during storm events A hydrologic study will be prepared for the project in accordance with Kern County requirements, and impacts will be analyzed in an EIR.

(c)(iii) As proposed, the project would result in an overall increase in impervious surfaces on-site, which could substantially increase the rate or amount of storm water runoff. The project would also alter the drainage pattern on the site, which could impede or redirect existing drainage patterns or obstruct the carrying capacity of the flow patterns crossing the project site. These impacts could result in substantial on- and off-site flooding. The project would be required to prepare a drainage plan to address storm water runoff impacts.

The EIR will assess changes to the drainage patterns, including but not limited to, exceeding the capacity of the project area's existing drainage system or result in new storm water drainage facilities that could create potentially significant environmental impacts The SWPPP and Water Quality Management Plan would provide the appropriate control and treatment, of storm water prior to discharge during project construction and operation, respectively. Potential impacts will be further evaluated in an EIR.

(c)(iv) The Federal Emergency Management Agency (FEMA) delineates flood hazard areas on its Flood Insurance Rate Maps (FIRMs). According to the FIRMs for the project area, portions of the project site are located in a Zone X, an area with a 0.2 percent annual chance of flooding (FEMA 2008). The project would be reviewed by the Kern County Public Works Department-Floodplain for adherence to applicable floodplain management standards; however, impacts would be potentially significant and will be further evaluated in an EIR.

(d) The project is not located near an ocean or large enclosed body of water, and therefore would not be subject to inundation by seiche or tsunami. Mudflows are a type of mass wasting or landslide, where earth and surface materials are rapidly transported downhill under the force of gravity and are often triggered by heavy rainfall and soil that is not able to sufficiently drain or absorb water and the super-saturation results in soil and rock materials to become unstable and slide away. Due to the relatively flat topography of the project and surrounding area, the potential to be inundated by mudflow is considered remote.

As discussed above, portions of the project site are located in Zone X with only a 0.2 percent annual chance of flooding (FEMA 2008). The project would be reviewed by the Kern County Public Works Department for adherence to all applicable floodplain management standards. In the event of inundate, there would be a related risk of release of pollutants. Potential impacts will be further evaluated in an EIR.

(e) The project site is located within the Tulare Lake Basin, which consists of approximately 17,000 square miles, and includes all of Tulare and Kings Counties, and most of Fresno and Kern Counties. Ongoing management of this basin is governed by the Tulare Lake Basin Portion of Kern County Integrated Regional Water Management Plan (IRWMP) and serves as a sustainable groundwater management plan (Kern Region Water Management Group 2020). A water supply assessment will be completed for the project to analyze potential impacts to groundwater resources, including any potential conflicts with the IRWMP. The project impact would be potentially significant and will be further analyzed in an EIR.

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than Significant Impact	No Impact

XI. Land Use and Planning

Would the project:

a.	Physically divide an established community?	☐	☐	☐	☒
b.	Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation for the purpose of avoiding or mitigating an environmental effect?	☒	☐	☐	☐

RESPONSES:

(a) The project site is located in a portion of Kern County consisting of commercial and agricultural uses, approximately one mile north of the Bakersfield City limits. The nearest residential community is Gossamer Grove, located approximately 0.6 mile southwest of the project site, and consists of single-family residences. The proposed project would not physically encroach into or physically divide or restrict access to the Gossamer Grove residential community. No new roadways or other linear elements that would have the potential to restrict existing access or movement within the local community are proposed. Therefore, no impacts relating to physically dividing an established community would occur as a result of the project, and further analysis in an EIR is not required.

(b) The project is subject to the requirements of the Kern County General Plan, the Metropolitan Bakersfield General Plan, and the Kern County Zoning Ordinance. The proposed project includes a request for land use entitlements necessary to allow the construction and operation of an industrial park, including:

- An amendment to the Metropolitan Bakersfield General Plan from R-IA (Intensive Agriculture, minimum 20-acre parcel size) to SI (Service Industrial);
- An amendment to the Kern County General Plan from 8.1 (Intensive Agriculture, minimum 20-acre parcel size) to 7.2 (Service Industrial); and
- A change in zone classification from A (Exclusive Agriculture) to M-2 (Medium Industrial) with a PD (Precise Development) Combining District.

Impacts related to land use planning, policies, or regulations would be potentially significant and will be further analyzed in an EIR.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than Significant Impact	No Impact

XII. Mineral Resources

Would the project:

a.	Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b.	Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	☒

RESPONSES:

(a) The project site was classified as a California Surface Mining and Reclamation Act (SMARA) study area in 1988 (DOC 2018). However, the project site is not within a mineral recovery area or a designated mineral and petroleum resource site established by the Kern County General Plan . The project site is not located within an area zoned NR (Natural Resources) or a Tier 1 Oil and Gas Conformity Tier. The closest area with a NR zoning is approximately 8,437 feet to the northeast and the closest Tier 1 Oil and Gas Conformity Tier is located 9,618 feet to the northeast. The closest active well is 3,650 feet south of the project site in the city of Shafter (CalGEM 2018). Additionally, according to the Kern GIS online resource Attribute Preview, the project site does not contain any parcels with mineral value. Further, the project site is not located near any wells or mineral extraction sites according to the Geologic Energy Management Division (CalGEM) well finder map (CalGEM 2018). Construction and operation of the proposed project would not interfere with mineral extraction and processing. Therefore, the project would have no impact on future mineral development and further analysis in an EIR is not required.

(b) As mentioned previously, the project site is not located within a designated mineral and petroleum resource site within the Kern County General Plan, or other land use plan. Therefore, the development of proposed project would not preclude future mineral resource development, nor would it result in the loss of a locally important mineral resource recover site. There would be no impact, and further analysis in an EIR is not required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than Significant Impact	No Impact

XIII. Noise

Would the project result in:

a.	Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in a local general plan or noise ordinance or applicable standards of other agencies?	☒	☐	☐	☐
b.	Generation of excessive groundborne vibration or groundborne noise levels?	☒	☐	☐	☐
c.	A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project	☒	☐	☐	☐
d.	For a project located within the vicinity of a private airstrip or Kern County Airport Land Use Compatibility Plan, would the project expose people residing or working in the project area to excessive noise levels?	☒	☐	☐	☐

RESPONSES:

(a) The project would generate noise during construction and operation and could therefore cause potentially significant impacts to sensitive receivers within a 0.5-mile radius of the project site. Land uses determined to be "sensitive" to noise as defined by the Kern County General Plan include residential areas, schools, convalescent and acute care hospitals, parks, and recreational areas, and churches. The Kern County General Plan Noise Element sets a 65 dBA (A-weighted decibels) Day Night noise level (Ldn) limit on exterior noise levels for stationary sources (i.e., non-transportation) at sensitive receivers The nearest sensitive receivers are a single-family residence located approximately 350 feet west of the project site, south of SR 99, and a single-family residence located approximately 2,100 feet from the project site (Bollard Acoustical Consultants, Inc. 2020).

Based on the noise assessment prepared for the project, the increase in traffic noise levels due to the proposed project would not exceed the standards of significance at existing sensitive receivers located along the project roadway network (Bollard Acoustical Consultants, Inc. 2020). Additionally, project industrial and construction noise levels at the project site would be masked by traffic on SR 99 for the residence located approximately 350 feet west, and would be below the ambient noise level environment at the residence located approximately 2,100 feet from the project site. However, future traffic noise from SR 99 has the potential to exceed applicable Metropolitan Bakersfield General Plan exterior noise levels at the project site if outdoor break areas are proposed within 300 feet from the

centerline of SR 99 (Bollard Acoustical Consultants, Inc. 2020). This issue will be further evaluated in an EIR.

(b) During project construction, heavy equipment would be used for grading, excavation, paving, and building construction, which could generate groundborne noise that could be audible to sensitive receivers in the area.

Given that predicted vibration levels at the residence located approximately 350 feet away from the project site during construction and operation are well below the strictest Caltrans thresholds for damage to residential structures and for severe human response (Bollard Acoustical Consultants, Inc. 2020), groundborne vibration impacts during construction and operation are not anticipated. Nonetheless, further analysis of groundborne vibration and groundborne noise resulting from project construction and operations will be further evaluated in an EIR.

(c) Operation of the proposed project would potentially result in a permanent increase in ambient noise levels in the project vicinity in the form of employee commuting traffic as well as truck trips associated with the transport of goods to and from the industrial park, thus the impact would be potentially significant. This impact will be further assessed in an EIR.

(d) The nearest public airport to the project site is the Meadows Field Airport located approximately 1.5 miles to the southeast. As shown in **Figure 7,** *Airport Land Use Compatibility Plan Map,* a portion of the project is located within the Extended Approach/Departure Zone and Adjacent to Runway (Area B-2) and Common Traffic Pattern (Area C) of the Meadows Field Airport. Area B-2 is categorized as having significant noise and risk impacts, as aircrafts are commonly below 800 feet, and Area C is categorized as limited risk with frequent noise intrusion. Therefore, aircraft noise from the Meadows Field Airport has the potential to generate excessive and significant noise levels at the project site and expose workers, if present within Areas B-2 or C of the Kern County ALUCP. Therefore, this impact will be further assessed in an EIR.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than Significant Impact	No Impact

XIV. Population and Housing

Would the project:

a.	Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☒	☐	☐	☐
b.	Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

RESPONSES:

(a) The proposed project would generate temporary work throughout the construction process for both Phase 1 and 2 of development. Construction workers would likely be expected to travel to the site from various local communities and locations throughout area, and few, if any workers expected to relocate to the surrounding area because of these temporary jobs. If temporary housing should be necessary, accommodations (i.e., extended stay hotels, apartments, RV parks, homes for rent or sale) could be available in the nearby cities and communities of Saco, Oildale, Bakersfield, and Shafter.

The proposed project would develop over six million square-feet for distribution/fulfillment center needs and warehouse space which would potentially create 5,000 to 6,000 full time equivalent jobs. Given the rural nature of the surrounding communities, the project would potentially require the development of new housing or businesses within the local communities to accommodate the increase in population. Given that the site is not currently designated or zoned consistent with planned industrials use, the project may induce substantial, unplanned growth in the project area. Therefore, this impact will be further analyzed in an EIR.

(b) The project site is currently utilized for vineyard/agricultural operations and does not contain any existing housing units. The proposed project would therefore not displace any existing people or housing, necessitating the construction of replacement housing elsewhere and is considered to have no impact. No further evaluation of this issue is required in an EIR.

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than Significant Impact	No Impact

XV. Public Services

Would the project:

a.	Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or to other performance objectives for any of the public services:				
i.	Fire protection?	☒	☐	☐	☐
ii.	Police protection?	☒	☐	☐	☐
iii.	Schools?	☒	☐	☐	☐
iv.	Parks?	☒	☐	☐	☐
v.	Other public facilities?	☒	☐	☐	☐

RESPONSES:

(a)(i) **Fire Protection.** The Kern County Fire Department (KCFD) provides fire suppression and emergency medical services to the project area. The fire station closest to the project site is Kern County Fire Station No. 62, located approximately 4.6 miles southeast of the project site at 1652 Sunnyside Court in Bakersfield. The proposed project would add over six million square-feet of structures to KCFD's service area, resulting in a related potential increase in service demand. Further, as discussed in XIV.(a), *Population and Housing*, the project has the potential to induce population growth in the area, including additional housing and service-oriented commercial uses. The increase in growth is likely to create an in-kind demand on fire service within the KCFD, Shafter Fire Department, and other nearby fire service areas. New development would be subject to design review consistent with current Fire Code and local fire department requirements aimed at reducing fire-related risk and loss. However, due to potential increase in service demand, impacts on fire protection would be potentially significant and will be further evaluated in an EIR.

(a)(ii) **Police Protection.** Law enforcement and public safety services in the project area are provided by the Kern County Sheriff's Department (KCSD). The closest station to the project site is the Kern County Sheriff's Office, located approximately five miles to the southeast at 1350 Norris Road, Bakersfield. The proposed project would add over six million square-feet of structures to KCFD's service area, resulting in a related potential increase in service demand. On-site security may reduce the need for police protection. Further, as discussed in XIV.(a), *Population and Housing*, the project

has the potential to induce population growth in the area, including additional housing and service-oriented commercial uses. The increase in growth is likely to create an in-kind demand on police protection demand for the area and impacts would be potentially significant. This issue will be evaluated in an EIR.

(a)(iii) **Schools.** During project construction, construction workers would be required. It is expected that most of these workers would live in the broader region and commute to the project site from surrounding communities where their children are already enrolled in school and where their contribution to local taxes, including funds for schools, is assessed locally. Therefore, substantial temporary increases in population during project construction would not adversely affect local school populations.

Long-term operation would result in up to 5,000 to 6,000 new jobs. The jobs may attract new residents from outside the area, and result in a related increase in the student population. The project also has the potential to induce population growth including an increased demand for service-oriented uses. Also see discussion in XIV.(a), Population and Housing. New industrial, residential, and commercial development, including the proposed project, would be required to pay development impact fees, which are considered to be complete mitigation under CEQA. Although school impact fees for new development would be required, the impacts to Schools would be potentially significant. Impacts to schools will be further evaluated in an EIR.

(a)(iv) **Parks.** During project construction, construction workers would be required. It is expected that most of these workers would live in the broader region and commute to the project site from surrounding communities where the families already use area parks.

However, as discussed in XIV. (a), *Population and Housing*, project operation has the potential to induce population growth in the area, including additional housing and service-oriented commercial uses. The project is anticipated to employ 5,000-6,000 people, some of whom may relocate to the area. In the Kern County General plan, Implementation Measure GG establishes a parkland/recreational space standard of service as 2.5 acres of park area per 1,000 residents. The project has the potential to increase the local population and related demand for public parkland. Impacts would be potentially significant and will be further analyzed in an EIR.

(a)(v) **Other Public Facilities.** During project construction, construction workers would be required. It is expected that most of these workers would live in the broader region and commute to the project site from surrounding communities where the families already use public facilities.

However, as discussed in XIV. (a), *Population and Housing*, project operation has the potential to induce population growth in the area, including additional housing and service-oriented commercial uses, resulting in an increase in demand for area public services. Therefore, impacts to public facilities would be potentially significant and will be further analyzed in an EIR.

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than Significant Impact	No Impact
XVI. Recreation					
Would the project:					
a.	Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☒	☐	☐	☐
b.	Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	☒	☐	☐	☐

RESPONSES:

(a) The nearest park facilities to the project site include Madison Grove Park, located approximately three miles to the southeast at 10115 Norris Road, Bakersfield and Almondale Park, located approximately four miles to the south at 5501 Verdugo Lane, Bakersfield. During project construction, construction workers would be required. It is expected that most of these workers would live in the broader region and commute to the project site from surrounding communities where the families already use area parks.

However, as discussed in XIV. (a), *Population and Housing*, project operation has the potential to induce population growth in the area, including additional housing and service-oriented commercial uses. The project is anticipated to employ 5,000-6,000 people, some of whom may relocate to the area. Therefore, the project has the potential to increase the local population and related demand for public park and recreation land. Therefore, impacts to parks and recreation facilities would be potentially significant and will be further analyzed in an EIR.

(b) The proposed project does not directly include or require the construction of new or expansion of existing recreational facilities, and there are no recreational facilities on the project site that would be affected. However, as discussed in a) above, the project has the potential to induce growth, which may increase the demand for new or expanded recreational facilities, the development of which might have adverse impacts on the environment. Therefore, impacts to recreational facilities would be potentially significant and will be further evaluated in an EIR.

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than Significant Impact	No Impact
XVII.	**Transportation and Traffic**				
	Would the project:				
a.	Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☒	☐	☐	☐
b.	Conflict or be inconsistent with CEQA Guidelines Section 15064.3 subdivision (b)?	☒	☐	☐	☐
c.	Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☒	☐	☐	☐
d.	Result in inadequate emergency access?	☒	☐	☐	☐

RESPONSES:

(a) The proposed project would generate short-term traffic during construction, and long-term traffic during the operational life of the project. A comprehensive traffic study will be prepared for the project; however, capacity impacts/level of service of are no longer a consideration under CEQA but may still be considered by the County as part of the project review process outside of CEQA. Conflicts with programs, plans, ordinances or policies addressing the circulation system would be potentially significant and will be further evaluated in an EIR.

(b) CEQA Guidelines Section 15064.3, subdivision (b) was adopted in December 2018 by the California Natural Resources Agency. These revisions to the CEQA Guidelines criteria for determining the significance of transportation impacts shifts the focus from driver delay to reduction of vehicular GHG emissions through creation of multimodal networks, and creation of a mix of land uses that can facilitate fewer and shorter vehicle trips. Vehicle miles traveled (VMT) is a measure of the total number of miles driven for various purposes and is sometimes expressed as an average per trip or per person. Construction traffic would be temporary and would not permanently affect VMT characteristics in this part of Kern County or elsewhere. The project's VMT characteristics would be potentially significant and will be further evaluated in an EIR.

(c) Impacts associated with increased hazards due to a design feature are considered potentially significant. The project would create an intensive (over six million square-feet) industrial complex, adjacent to a substantially agricultural setting. Public roads may be shared by large, slow moving farm equipment and faster, project generated traffic, may be a hazard consideration, and would be potentially significant. This impact will be further evaluated in an EIR.

(d) The project would implement roadway improvements which could affect emergency access during construction activities. The project would also require/develop emergency access for the project site and its employees and would, therefore, result in potentially significant impacts. Further analysis of this issue will be provided in an EIR.

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than Significant Impact	No Impact

XVIII. Tribal Cultural Resources

Would the project:

a.	Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
	i.	Listed or eligible for listing in the California Register of Historical Resources, or in a local register or historical resources as defined in Public Resources Code section 5020.1(k), or	☒	☐	☐	☐
	ii.	A resource determined by the lead agency in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☒	☐	☐	☐

RESPONSES:

(ai,aii) The proposed project has the potential to impact tribal cultural resources, if present, during site clearance and earthmoving activities. Tribes with possible cultural affiliation and interest within the project area have been notified pursuant to the requirements of Assembly Bill 52, and SB 18 and consultation with the potentially affected tribes will occur, as appropriate, between the County and the tribes. Impacts would be potentially significant and will be further evaluated in an EIR.

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than Significant Impact	No Impact

XIX. Utilities and Service Systems

Would the project:

a.	Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☒	☐	☐	☐
b.	Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☒	☐	☐	☐
c.	Result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☒	☐	☐	☐
d.	Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☒	☐	☐	☐
e.	Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☒	☐	☐	☐

RESPONSES:

(a) **Water Facilities.** The proposed project would include the extensions of the OMWC's six-inch domestic water line and 12-inch non-potable water line from approximately one mile west of Quinn Road along Imperial Street to the southeast corner of the proposed project. Impacts from the extension of these facilities would be potentially significant and may to result in adverse environmental impacts. Therefore, impacts will be further evaluated in an EIR.

Wastewater Facilities. The project involves installation of a new sewer trunk from the future intersection of Imperial Street at Endes Street, via Coffee Road and 7th Standard Road. Additionally, Phase 1 of the proposed project would require a sewer lift station to reach the new sewer trunk. Therefore, impacts associated with installation of a new sewer trunk and sewer lift station would be potentially significant and will be further evaluated in an EIR.

Storm Water Facilities. The proposed project may require expanded or new storm drainage facilities as the proposed industrial park would increase the impervious surface area, leading to an increase in runoff during storm events. Therefore, associated impacts relating to storm water facilities would be potentially significant and will be further evaluated in an EIR.

Power, Natural Gas, and Telecommunication Facilities. The proposed project would involve construction of a new SoCal Gas natural gas pressure reducing station, gas main and laterals, and a new PG&E electrical substation and distribution. Therefore, associated impacts from the construction of the natural gas pressure reducing station, gas main and laterals, and electrical substation and distribution would be potentially significant and will be further evaluated in an EIR.

(b) The project would create an overall increase in the demand for water service for employee use, industrial activity, and landscaping. A Water Supply Assessment will be completed for the project to analyze potential water sources and potential impacts to water supplies. This impact would be potentially significant and will be further evaluated in an EIR.

(c) Portable toilets would provide for wastewater disposal during project construction and no connection to a public system for wastewater treatment would be required. The proposed project would include installation of a new sewer trunk and sewer lift station. The project would create an overall increase in the demand for wastewater collection and treatment, commensurate with the 5,000 to 6,000 new employees that would be associated with the new industrial park. Therefore, the project may have potentially significant impacts on existing wastewater treatment facilities, which will be further evaluated in an EIR.

(d) Materials brought to the project site would be used to construct facilities, and few residual waste materials are expected. Non-hazardous construction refuse and solid waste would be either collected and recycled per the Construction Waste Management Plan or disposed of at a local Class III landfill, while any hazardous waste generated during construction would be disposed of at an approved off-site location. The Kern County Public Works Department operates seven landfills throughout the county located in Bakersfield (Bena Landfill), Boron, Mojave-Rosamond, Ridgecrest, Shafter-Wasco, Taft, and Tehachapi. Implementation of the proposed project is not expected to generate quantities of solid waste in excess of existing landfill capacity. Nonetheless, potential impacts will be further evaluated in an EIR.

(e) The proposed project would generate solid waste during construction and operation, thus requiring the consideration of waste reduction and recycling measures. The 1989 California Integrated Waste Management Act (AB 939) requires Kern County to attain specific waste diversion goals. In addition, the California Solid Waste Reuse and Recycling Access Act of 1991, as amended, requires expanded or new development projects to incorporate storage areas for recycling bins into the proposed project design. The proposed project would be required to comply with the 1989 California Integrated Waste Management Act and the 1991 California Solid Waste Reuse and Recycling Access Act of 1991. Nonetheless, further analysis of the pertinent solid waste reduction and management regulations applicable to this project will be included in an EIR.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than Significant Impact	No Impact

XX. Wildfire

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

a.	Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
b.	Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☒	☐
c.	Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☒	☐
d.	Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☒	☐

RESPONSES:

(a) through (d) According to the Fire Hazard Severity Zones map published by CalFire, the project site is not located within or near state responsibility areas or lands classified as very high fire hazard severity zones (VHFHSZ); (CalFire 2020). The project site is classified as Local Responsibility Area (LRA) Moderate; thus, the potential for wildfire on the project site exists, but is not considered high. Furthermore, the proposed project would be subject to design review, and comply with applicable wildland fire management plans and policies established by the Kern County Fire Department. Therefore, the project does not have the potential to result in fire-related impacts associated with or being near a very high fire hazard severity zone. Impacts would be less than significant.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than Significant Impact	No Impact

XXI. Mandatory Findings of Significance

a.	Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	☒	☐	☐	☐
b.	Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	☒	☐	☐	☐
c.	Does the project have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly?	☒	☐	☐	☐

RESPONSES:

(a) The proposed project has the potential to change the quality of the environment, including fish and wildlife habitat and populations. The EIR's biological, cultural, and tribal cultural resources sections will discuss specific project impacts on plants and wildlife including avian species and impacts to cultural and tribal cultural resources. The change in quality of environment is considered significant and an EIR will evaluate the project's contribution to cumulative biological, cultural and tribal cultural resources impacts.

(b) The proposed project has the potential to cumulatively contribute to significant aesthetics, air quality, biological resources, cultural resources, tribal cultural resources, GHG emissions, and traffic impacts. Such impacts could occur during the construction phases and/or as a result of project operation. An EIR will evaluate the project's contribution to cumulative impacts.

(c) The proposed project could result in long-term air pollutant emissions or noise sources that would adversely affect nearby sensitive receptors. The proposed project could include industrial processes or equipment that would generate hazardous substances or wastes that would threaten the well-being of people on- or off-site. In addition, short-term construction activities could result in temporary

increases in pollutant concentrations and potentially significant off-site noise impacts. Pollutants of primary concern commonly associated with construction-related activities include toxic air contaminants gaseous emissions of criteria pollutants, and fugitive dust. Within the project area, the potential for increased occurrences of Valley Fever and is also of concern. Human health impacts from the short-term and long-term cumulative contribution to air quality impacts from project construction will be further evaluated in an EIR.

4. References

Bollard Acoustical Consultants, Inc. 2020. Environmental Noise & Vibration Assessment: Malibu Vineyards Rezone Project – Phases 1 & 2.

California Air Resources Board (CARB). 2017. California's 2017 Climate Change Scoping Plan. Available at: https://ww2.arb.ca.gov/sites/default/files/classic//cc/scopingplan/scoping_plan_2017.pdf

California Department of Conservation (DOC). 2018. CGS Information Warehouse: Mineral Land Classification. https://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=mlc

_____. 2019. *California Important Farmland Finder Map*. Accessed April 2021. https://maps.conservation.ca.gov/dlrp/ciff/app/

California Department of Forestry and Fire Protection (CalFire). 2020. Fire Hazard Severity Zone Maps. https://gis.data.ca.gov/datasets/789d5286736248f69c4515c04f58f414.

California Department of Forestry and Fire Protection (CalFire). 2020. FHSZ Viewer. https://egis.fire.ca.gov/FHSZ/

California Department of Transportation (Caltrans). Scenic Highways – List of Officially Designated State Scenic Highways. 2021. Available at: https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=2e921695c43643b1aaf7000dfcc19983

California Department of Toxic Substances Control (DTSC). 2021. EnviroStor. https://www.envirostor.dtsc.ca.gov/public/map/?global_id=15340023.

California State Water Resources Control Board (SWRCB). 2021. GeoTracker. https://geotracker.waterboards.ca.gov/map/?global_id=T0607302824.

Geologic Energy Management Division (CalGEM). 2021. Well Fnder CalGEM GIS. https://maps.conservation.ca.gov/doggr/#dataviewer

Kern, County of. 2009. Kern County General Plan - Noise Element. https://psbweb.co.kern.ca.us/planning/pdfs/kcgp/KCGPChapter3.pdf.

_____. 2012. Airport Land Use Compatibility Plan. https://psbweb.co.kern.ca.us/planning/pdfs/ALUCP2012.pdf

_____. 2009. Kern County General Plan (KCGP). https://psbweb.co.kern.ca.us/planning/pdfs/kcgp/KCGP_Complete.pdf

_____. 2021a. Kern County GIS. https://maps.kerncounty.com/H5/index.html?viewer=KCPublic

_____. 2021b. Visual Impact Assessment.

_____. 2021c. Zoning Ordinance. Available at: https://library.municode.com/ca/kern_county/codes/code_of_ordinances?nodeId=TIT19ZO_CH19.81OULIDASKOR_19.81.010PUAP

Krazan & Associates, Inc. 2020. Geotechnical Feasibility Study – Proposed Malibu Vineyards Development NE of Highway 99 and Imperial Street, Kern County California

MESA Biological LLC. 2020. Biological Assessment
of 746 Acres +/- at Northeast of Hwy 99 & Imperial Avenue Portions of Sections 24 & 25, T.28S., R.26E,; and a portion of Sections 29 & 30, T.28S., R.27E.
County of Kern, CA.

McIntosh & Associates 2020a. *Hazardous Materials Evaluation Report – Malibu Vineyards Industrial Park*.

_____. 2020b. Ma*ster PD Plan No. 2, Map No. 80 and 81, Malibu Vineyards Industrial Park*.

_____. 2020e. Energy Study Report for Malibu Vineyards Industrial Park.

_____. 2020d. Traffic Study – General Plan Amendment and Zone Change Northeast of Highway 99 and Imperial Avenue, Kern County, California

San Joaquin Valley Air Pollution Control District (SJVAPCD). 2015. *Guidance for Assessing and Mitigating Air Quality Impacts (GAMAQI)*. March 19, 2015.
https://www.valleyair.org/transportation/GAMAQI_12-26-19.pdf

Southern Kern Unified School District. 2020. Resolution #19-20-12 Resolution of the Governing Board of the Southern Kern Unified School District Regarding School Facilities Frees.
https://www.skusd.k12.ca.us/site/handlers/filedownload.ashx?moduleinstanceid=2400&dataid=3859&FileName=Reso%2019-20-12%20Increase%20Dev%20Fees.pdf

This page intentionally left blank.

Appendix A.2

Notice of Preparation Comments

This page intentionally left blank.

SIERRA CLUB

KERN-KAWEAH CHAPTER

P.O. Box 3357
Bakersfield, CA 93385
September 3, 2022

VIA ELECTRONIC MAIL

Kern County Planning Department
2700 "M" Street, Suite 100
Bakersfield, CA 93301

Re: Notice of Preparation for Malibu Vineyards Industrial Parkway Project by Malibu Vineyards, L.P.; GPA 9, Map 80; GPA 23, Map 81; ZCC 13, Map 80; ZCC 92, Map 81; PD 2, Map 80; PD 74, Map 81; PD 75, Map 81

Dear Planners:

The proposed Malibu Vineyards Industrial Parkway Project involves the development of approximately 8,786,734 square feet of industrial use space, comprised of 24 buildings on approximately 739 acres of existing vineyard. The project site is located within unincorporated Kern County, north of Imperial Avenue and generally east of State Route 99. The project site is just east of Shafter, which is on the west side of SR 99, and approximately one mile north of Bakersfield.

Considering the potential short term and long-term impacts of this development on the environmental health of Kern County and surroundings, the EIR for this project should address numerous issues including:

GREENHOUSE GAS EMISSIONS

Global warming is a serious issue, perhaps the most serious issue that we as a species will ever have to face. Dr. James Hansen, Director of the NASA Goddard Institute for Space Studies writes, "The stakes, for all life on the planet, surpass those of any previous crisis. The greatest danger is continued ignorance and denial, which could make tragic consequences unavoidable." Many scientists say that the world is reaching tipping points beyond which global temperature increases will be irreversible (see http://www.reuters.com/article/2012/03/26/climate-thresholds-idUSL6E8EQ4GA20120326?feedType=RSS&feedName=everything&virtualBrandChannel=11563).

California courts have ruled, “the greater the existing environmental problems are, the lower the threshold should be for treating a project’s contribution to cumulative impacts as significant.”

Given the climate crisis’ seriousness, the County must require a GHG study and should be addressing the issue with specific feasible greenhouse gas (GHG) mitigation measures. We list below a number of potential feasible GHG mitigation measures, many of which address criteria pollutant emissions as well; the County should evaluate these mitigation measures and **require this project to adopt a sufficient number of effective climate change measures to offset cumulative impacts**.

The EIR should examine and consider a number of possible potential feasible mitigation measures, including:

- **A requirement that structures contain enough solar photovoltaics (PV) and solar water heating to significantly offset energy usage,** with a capacity that matches the maximum allowed for distributed solar connections to the grid.
- In order to encourage the use of non-polluting electric vehicles, the County should require this project to include fast charge Level 3 **EV charging facilities** open and accessible to the public. This project is close to Highway 99, and such fast charge facilities could reduce pollution by encouraging intercity EV travel. See http://www.wind-works.org/cms/index.php?id=84&tx_ttnews%5Btt_news%5D=3401&cHash=ae60686195244d8cb5d31cad14e4aa92.
- In order to encourage the use of non-polluting electric vehicles, the County should require parking lots for all facets of this project to include dedicated EV parking and charging, including numerous charging stations for electric trucks. The stalls should be covered with photovoltaic cells both to protect parked vehicles from heating and to generate clean energy for the project.
- **A requirement that the project finance solar PV construction over the portion of the Lerdo canal that passes through the project site.**
- Green building measures should be used, including passive solar design and a requirement that buildings be at least 25% more energy efficient than Title 24 standards current when permits are pulled.
- Satisfy LEED Silver or higher standards on the commercial buildings.
- Design features to reduce Vehicle Miles Traveled (VMT). Such features might include adjacent bus stops and/or other public transportation and should include bicycle-friendly features.
- A requirement that the buildings meet the State goal of Zero Net Energy.
- A requirement that the buildings be all-electric.

- A requirement for partial funding of an area energy efficiency program (perhaps in a nearby environmental justice community) creating equivalent reductions in carbon emissions.
- A requirement that the project partially subsidize public transportation in nearby communities in order to reduce area VMT.
- A condition that parking lots be covered and that parking lot roofs contain solar PV.
- A requirement that the developer retrofit solar PV on existing area buildings. Retrofitting existing area buildings with solar PV would effectively offset emissions associated with this project in much the same way as the SJVAPCD uses ISR funds to fund offsite projects to offset criteria pollutants associated with development projects.
- A requirement that the developer contribute funding for area solar PV incentives. Most solar PV incentive programs use funding rebates to encourage PV construction.
- A requirement that the developer contribute a GHG fee to the San Joaquin Valley Air Pollution Control District to be used to fund projects that would reduce GHG emissions elsewhere. This could be built into a criteria pollutant VERA as the Air District has suggested in the past.

For the public and the decision-makers to be able to decide on the efficacy of the measures on climate change and on the energy sector, specific requirements should be presented before the project is approved.

The environmental documents must evaluate these potential mitigation measures in order to require sufficient mitigation to substantially reduce the impact of the project on the climate crisis.

AIR POLLUTION

The southern San Joaquin Valley fights it out every year with Los Angeles for having the worst air pollution in the nation. See the American Lung Association report at http://www.lung.org/our-initiatives/healthy-air/sota/city-rankings/states/california/. Since our extreme air pollution affects the health of many residents, the EIR must thoroughly address the issue.

In a region with arguably the dirtiest air in the nation and where 31% of Kern County children have asthma, any air pollution additions must be considered significant. The EIR must require a thorough Air Study and must adopt specific enforceable mitigation measures. **The EIR should examine and consider the following feasible methods to reduce the impact**:

- Operational NOx emissions are primarily related to mobile sources. The project should provide employment opportunities and regular bus routes between the project and local low-income and minority communities (for example, Shafter, Wasco, Southeast Bakersfield) to transport workers. The buses should be electric vehicles charged from the project's photovoltaic panels.
- A requirement that the project partially subsidize public transportation in order to reduce area VMT.
- All service equipment should be zero emission.
- The project should encourage workers to drive low-emission vehicles, perhaps furnishing electric vehicles with no emissions whatsoever with onsite charging stations.
- In order to encourage areawide use of non-polluting electric vehicles (EVs), the project should be required to incorporate Level 3 EV fast-charging stations open to the public and accessible to EV drivers on Highway 99.
- Centerpoint Strategies, a warehouse project in North Richmond, has agreed to a rapid electrification of vehicles at the site with 33% of the fleet required to be zero-emission vehicles at start of operations, 65% of the fleet to be zero-emission vehicles by the end of 2023, 80% of the fleet to be zero-emission vehicles by the end of 2025, and 100% of the fleet to be zero-emission vehicles by the end of 2027. Malibu Vineyards should follow this example.
- The developer can reduce project emissions to zero by entering into a Developer Mitigation Contract (DMC) with the SJVAPCD. A DMC should include specific enforceable measures and should not allow the developer to defer the development and implementation of these measures to a later date.
- In its December 20, 2019, letter on the 99 Houghton Industrial Park project, the California Air Resources Board included a list of air pollution reduction measures specific to projects such as this one (attached below). The EIR should examine and address each of these potential mitigation measures as well as updated CARB recommendations.
- Many of the potential feasible GHG mitigation measures listed in a previous section also reduce criteria pollutants, should be considered as air pollution reduction measures, and addressed as such in the EIR.

The EIR must evaluate these and similar mitigation measures to reduce the impact of this project on air pollution.

The EIR must disclose whether trucks and trailers with transport refrigeration units will be allowed on this project site. If so, the EIR must model air pollution emissions from these on-site transport refrigeration units, and the County must prepare a health risk assessment that shows the potential health risk.

An enormous body of evidence documents that low-income and/or minority communities are disproportionately exposed to various sources of air pollution such as from heavy-duty trucks heading to industrial warehouse and distribution sites such as this proposed project. Assembly Bill 617 (AB 617) was designed to directly address ongoing issues of local air pollution in disadvantaged communities. The Shafter region, just across SR 99 from this proposed project, is one of the 15 communities in the state's AB 617 environmental justice program. The EIR must address this project's air and climate impact to the AB 617-designated Shafter region.

The Norris Middle School is two miles from the project site; schools in the AB 617-designated Shafter region are about 8 miles from the project. The EIR must address the project's air pollution impact on these sensitive receptors.

Dust mitigation as described in most EIRs is not efficient in reducing the threat of Valley fever. The EIR should require soil testing for Valley fever.

Forest preservation is one of the best ways to naturally sequester atmospheric carbon. Trees and other plants in increasing elevation are negatively impacted by mobile and stationary source pollution from motor vehicles and industry. Sequoia National Forest and Sequoia-Kings Canyon National Parks are the most polluted parks and forests in the federal system. This pollution is directly attributed to San Joaquin Valley activities. See, for example, http://www.elsevier.com/books/ozone-air-pollution-in-the-sierra-nevada-distribution-and-effects-on-forests-2/bytnerowicz/978-0-08-044193-1 or http://www.fs.fed.us/psw/southernsierrascience/speakers/pdf/cisneros.pdf. The EIR must examine and mitigate the cumulative air pollution effects of this project on forest resources.

The EIR must address the project's cumulative impact to air pollution. While this cumulative impact is certainly significant, it is not unavoidable. We offer the above suggestions as some feasible methods to reduce the cumulative impact. Were project emissions reduced to zero via a DMC or other methods, then the project would have no cumulative air pollution impact since zero project-specific impact could not add to the cumulative impact.

ALTERNATIVES

We note that "[a] potential alternative should not be excluded from consideration merely because it 'would impede to some degree the attainment of the project objectives, or would be more costly" even when that alternative includes Project development on an alternative site. *Save Round Valley Alliance v. County of Inyo*, 157 Cal. App. 4th 1437, 1456-57 (2007).

The EIR must contain an alternative that could significantly reduce total vehicle miles traveled. There may be alternative infill sites that should be considered; for example, the long-defunct East Hills Mall should be considered as an alternative infill site for this project. Moreover, some new development is occurring in downtown urban areas, and there may be large redevelopment areas available in downtown urban areas for an alternate site.

That some of the alternative sites may be located in the City is irrelevant to the alternatives analysis required by CEQA, and certainly the East Hills Mall is in close proximity to both the workforce and backbone infrastructure. There may also be large redevelopment areas close to or within local low-income and minority communities (for example, Shafter, Wasco). The EIR should consider an "**Infill Alternative**" and perhaps even consider appropriate sites within existing cities.

The EIR should explore a "**Transit-oriented Alternative"** for the proposed project, an alternative in which design is focused on effective public transportation to and from the project. This alternative should include parking management measures that promote transit use and should include consideration of area-wide light rail and its cumulative effect on traffic congestion. The project should provide employment opportunities and regular bus routes between the project and local low-income and minority communities (for example, Shafter, Wasco, Southeast Bakersfield) to transport workers. The buses should be electric vehicles charged from the project's photovoltaic panels.

FARMLAND CONVERSION

This project would convert 739 acres of existing vineyard (314 acres of prime farmland) to urban use. The EIR must address this loss of agricultural land, not only project-specific conversion but also, given numerous other projects on farmland, cumulative farmland loss.

A primary farmland loss mitigation method is a requirement that the developer fund the purchase of agricultural conservation easements. In evaluating the feasibility of farmland loss mitigation, the EIR should consider the following arguments.

In Masonite Corp. v. County of Mendocino (2013) 218 Cal.App.4th 230, the Court of Appeal concluded that agricultural conservation easements (ACEs) "may appropriately mitigate the direct loss of farmland when a project converts agricultural land to a nonagricultural use…. Our conclusion is reinforced by the CEQA Guidelines, case law on offsite mitigation for loss of biological resources, case law on ACEs, prevailing practice, and the public policy of this state. Id "

Masonite also cited California Farm Bureau Federation (CFBF) observation that "The permanent protection of existing resources off-site is effective mitigation for [a project's direct, cumulative, or growth-inducing] impacts because it prevents the consumption of a resource to the point that it no longer exists.... If agricultural land is permanently protected off-site at, for example, a 1:1 replacement ratio, then at least half of the agricultural land in a region would remain after the region has developed its available open space." By thus preserving substitute resources, ACEs compensate for the loss of farmland within the Guidelines' definition of mitigation. (Guidelines, § 15370, subd. (e) [mitigation includes "[c]ompensating for the impact by replacing or providing substitute resources or environments"].) Id.

- The County has argued in the past that it cannot legally require agricultural easements as mitigation for farmland conversion. The decision, San Mateo County

Coastal Landowners' Association, et al. v. County of San Mateo et al (1995) 38 Cal.App.4th 523, 549 held that "Civil Code §815.9 does not restrict the ability of a local governmental entity to require the dedication of an easement under other provisions of the law", such as CEQA. In light of the San Mateo and Masonite cases, the County cannot insist that it is legally precluded from requiring the acquisition of agricultural conservation easements. The County should require easements.

- A recent Superior Court decision in Visalia stated that "our courts have specifically acknowledged that agricultural conservation easements are a *potentially* viable mitigation measure, notwithstanding that they do not reduce farmland loss impacts to a less than significant level." The County should require easements.
- By law and definition, an agricultural conservation easement (ACE) must be a perpetual easement.
- Such easements must be monitored and enforced, and an endowment should be set up to pay for monitoring and enforcement expenses.
- In order to be confident that the ACE will be appropriately enforced, ACEs are normally held be an accredited land trust. The easement holder must be an accredited land trust.
- Qualifying mitigation land must be of equal quality and under somewhat similar development pressure.
- Mitigation land should be local, if not in Kern County at least in the southern San Joaquin Valley.
- In order to reduce this significant and unavoidable impact and to be more certain that the mitigation measure satisfies CEQA requirements for farmland conversion mitigation, the County should require that three acres of equally good, equally at-risk farmland be preserved elsewhere for every acre of agricultural land converted to urban use.

The EIR must address these issues.

CUMULATIVE IMPACTS

We include a cumulative list of several of the additional current new industrial park and/or proposed commercial or truck stop projects within the area:

- 99 Houghton Industrial Park Project on 314.30 acres adjoining Highway 99 (Kern County) (https://ceqanet.opr.ca.gov/2009051005/3)
- Ware Malcomb Industrial Project in unincorporated Kern County at the intersection of Houghton Road and Wible Road.

- Majestic Gateway Project on ±90.6 acres located east of SR-99, west of South H Street in Bakersfield.
- CUP 20-0379, a truck stop project on 16 acres on Taft Highway west of Highway 99 (City of Bakersfield)
- GPA ZC 19-0158 at South Union and Berkshire Road (City of Bakersfield)
- GPA ZC 19-0009 at Taft Highway and Ashe Road (City of Bakersfield)
- GPA ZC 19-0035 at Hosking and Wible (City of Bakersfield)
- Mettler Station project located at 1841 Mettler Frontage Road (USDA)
- Numerous such projects in the Tejon Industrial Complex
- The EIR for the 99 Houghton Industrial Park Project lists 14 pages of pending projects with 6 miles of that project.

There are likely other such projects of which we are not aware.

The cumulative impacts of this project, of those listed above, and of other area projects on air pollution, traffic, climate change, biological resources, farmland loss, and other issues must be thoroughly addressed.

GROWTH INDUCEMENT

The project would potentially create 5,000 to 6,000 full time equivalent jobs. Given the rural nature of the surrounding communities, the project would potentially require the development of new housing or businesses within the local communities to accommodate the increase in population. With such a large workforce concentrated in the area, the EIR should examine the pressure to expand area housing and other amenities.

The Metropolitan Bakersfield General Plan encourages the orderly outward expansion of new urban development that maintains continuity of existing development and allows incremental expansion of infrastructure and public services. The leapfrog use of this site for industrial uses would set a clear precedent, inducing urban sprawl generating increased traffic congestion and likely leading to premature conversion of other prime farmland. The EIR should fully address the potential for growth inducement.

NEED FOR THE PROJECT

One of the policies of the Metropolitan Bakersfield General Plan requires, among other things, a “demonstrated project need” when converting farmland to urban use. There are numerous other warehouse/industrial park projects either existing or proposed in Kern County, in Shafter, and in Bakersfield. With this existing or proposed capacity as background, the EIR must demonstrate the need for this additional industrial park.

BIOLOGICAL RESOURCES

Many sensitive and special status species have occurred historically in the vicinity of the project site. Many species such as birds of prey and the endangered San Joaquin Valley kit fox make a living along the margins of farmlands.

Special-status species such as San Joaquin kit fox, blunt-nosed leopard lizard, grasshopper sparrow, golden eagle, Tulare grasshopper mouse, burrowing owl, and loggerhead shrike may occur in the proposed project areas. The sharp-shinned hawk, burrowing owl, prairie falcon, and northern harrier were observed during surveys for the proposed 99 Houghton Industrial Park project. Given the special status of these species, the EIR should require pre-construction surveys to observe CDFG protocols and to be extended to a buffer area surrounding the sites.

The EIR should investigate whether the project site contains potential foraging habitat and/or nesting habitat for the Swainson's hawk. Mitigation measures might include requiring the project to plant trees that could serve as Swainson's hawk nesting sites and requiring the project to purchase conservation easements on nearby Swainson's hawk foraging habitat.

Loss of habitat is a major reason for species decline. While many of these species may have been driven out of the project site by mowing and disking operations, the EIR should consider reintroducing some of the native plant species by replanting them in project open space areas. In addition, landscaping should include drought-tolerant and/or native plants.

According to the publication *Conservation Strategies for San Joaquin Kit Foxes in Urban Environments* by Brian Cypher, Christine Van Horn Job, and Scott Phillips at http://esrp.csustan.edu/publications/pdf/cypher_etal_2012_urban_kitfox_conservation_esrp.pdf, "To the extent practical and possible, urban planners could design new developments in a manner that facilitates use by kit foxes." This project should be designed with urban kit fox conservation measures in mind, perhaps including artificial kit fox dens and movement corridors as suggested in the above document.

It is possible that kit fox dens are located on the site. If a den cannot be avoided, will it be excavated and the kit foxes relocated? The publication *Feasibility and Strategies for Translocating San Joaquin Kit Foxes to Vacant or Restored Habitats* by Samantha Bremner-Harrison and Brian Cypher at http://esrp.csustan.edu/publications/pdf/esrp_2007_kitfoxreloction_w.pdf gives evidence that kit fox relocation is complex and will likely not be successful. The EIR should address this evidence.

TRAFFIC, WATER

The EIR should include a comprehensive traffic study. The traffic study should analyze the project's cumulative traffic impact on Highway 99 and other area roads, including

anticipated traffic from the other proposed or existing area warehouse/industrial park projects.

In particular, the Governor's Office of Planning and Research states, “Lead agencies should not truncate any VMT analysis because of jurisdictional or other boundaries, for example, by failing to count the portion of a trip that falls outside the jurisdiction or by discounting the VMT from a trip that crosses a jurisdictional boundary.” (https://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf) In addition, if travel patterns are substantially affected outside of the area of analysis, the area of analysis should be expanded to include the full affected area. **When assessing trip based VMT, include the full trip, even if it goes beyond a jurisdictional boundary**.

Potable water would be provided to the project site by the Oildale Mutual Water Company (OMWC). While Imperial Road seems to be within the service area of OMWC, the project site itself doesn’t seem to be within the service area. Will OMWC require approval from the California Public Utility Commission to expand its service area to include the proposed project? The EIR must address the timeline to assure that the project has an adequate potable water supply.

Please place the Sierra Club on the distribution list for the Malibu Vineyards Industrial Parkway Project to receive any noticing of meetings, hearings, availability of documents, and to receive the environmental documents. We prefer email communications and electronic formatting of documents. Thank you for your consideration and for the opportunity to comment.

Sincerely,



Gordon L. Nipp, Ph.D.

Vice-Chair

gnipp@bak.rr.com

661-872-2432

ATTACHMENT A

Recommended Air Pollution Emission Reduction Measures for Warehouses and Distribution Centers

California Air Resources Board (CARB) staff recommends developers and government planners use all existing and emerging zero to near-zero emission technologies during project construction and operation to minimize public exposure to air pollution. Below are some measures, currently recommend by CARB staff, specific to warehouse and distribution center projects. These recommendations are subject to change as new zero-emission technologies become available.

Recommended Construction Measures

1. Ensure the cleanest possible construction practices and equipment are used. This includes eliminating the idling of diesel-powered equipment and providing the necessary infrastructure (e.g., electrical hookups) to support zero and near-zero equipment and tools.

2. Implement, and plan accordingly for, the necessary infrastructure to support the zero and near-zero emission technology vehicles and equipment that will be operating on site. Necessary infrastructure may include the physical (e.g., needed footprint), energy, and fueling infrastructure for construction equipment, on-site vehicles and equipment, and medium-heavy and heavy-heavy duty trucks.

3. In construction contracts, include language that requires all off-road diesel-powered equipment used during construction to be equipped with Tier 4 or cleaner engines, except for specialized construction equipment in which Tier 4 engines are not available. In place of Tier 4 engines, off-road equipment can incorporate retrofits such that emission reductions achieved equal or exceed that of a Tier 4 engine.

4. In construction contracts, include language that requires all off-road equipment with a power rating below 19 kilowatts (e.g., plate compactors, pressure washers) used during project construction be battery powered.

5. In construction contracts, include language that requires all heavy-duty trucks entering the construction site, during the grading and building construction phases be model year 2014 or later. All heavy-duty haul trucks should also meet CARB's lowest optional low-NO_x standard starting in the year 2022.[1]

[1] In 2013, CARB adopted optional low-NO_x emission standards for on-road heavy-duty engines. CARB staff encourages engine manufacturers to introduce new technologies to reduce NO_x emissions below the current mandatory on-road heavy-duty diesel engine emission standards for model years 2010 and later. CARB's optional low-NO_x emission standard is available at: https://www.arb.ca.gov/msprog/onroad/optionnox/optionnox.htm.

6. In construction contracts, include language that requires all construction equipment and fleets to be in compliance with all current air quality regulations. CARB staff is available to assist in implementing this recommendation.

Recommended Operation Measures

1. Include contractual language in tenant lease agreements that requires tenants to use the cleanest technologies available, and to provide the necessary infrastructure to support zero-emission vehicles and equipment that will be operating on site.

2. Include contractual language in tenant lease agreements that requires all loading/unloading docks and trailer spaces be equipped with electrical hookups for trucks with transport refrigeration units (TRU) or auxiliary power units. This requirement will substantially decrease the amount of time that a TRU powered by a fossil-fueled internal combustion engine can operate at the project site. Use of zero-emission all-electric plug-in TRUs, hydrogen fuel cell transport refrigeration, and cryogenic transport refrigeration are encouraged and can also be included lease agreements.[2]

3. Include contractual language in tenant lease agreements that requires all TRUs entering the project site be plug-in capable.

4. Include contractual language in tenant lease agreements that requires future tenants to exclusively use zero-emission light and medium-duty delivery trucks and vans.

5. Include contractual language in tenant lease agreements requiring all TRUs, trucks, and cars entering the Project site be zero-emission.

6. Include contractual language in tenant lease agreements that requires all service equipment (e.g., yard hostlers, yard equipment, forklifts, and pallet jacks) used within the project site to be zero-emission. This equipment is widely available.

7. Include contractual language in tenant lease agreements that requires all heavy-duty trucks entering or on the project site to be model year 2014 or later, expedite a transition to zero-emission vehicles, and be fully zero-emission beginning in 2030.

[2] CARB's Technology Assessment for Transport Refrigerators provides information on the current and projected development of TRUs, including current and anticipated costs. The assessment is available at: https://www.arb.ca.gov/msprog/tech/techreport/tru_07292015.pdf.

8. Include contractual language in tenant lease agreements that requires the tenant be in, and monitor compliance with, all current air quality regulations for on-road trucks including CARB's Heavy-Duty (Tractor-Trailer) Greenhouse Gas Regulation,[3] Periodic Smoke Inspection Program (PSIP),[4] and the Statewide Truck and Bus Regulation.[5]

9. Include contractual language in tenant lease agreements restricting trucks and support equipment from idling longer than five minutes while on site.

10. Include contractual language in tenant lease agreements that limits on-site TRU diesel engine runtime to no longer than 15 minutes. If no cold storage operations are planned, include contractual language and permit conditions that prohibit cold storage operations unless a health risk assessment is conducted and the health impacts fully mitigated.

11. Include rooftop solar panels for each proposed warehouse to the extent feasible, with a capacity that matches the maximum allowed for distributed solar connections to the grid.

---

[3] In December 2008, CARB adopted a regulation to reduce greenhouse gas emissions by improving the fuel efficiency of heavy-duty tractors that pull 53-foot or longer box-type trailers. The regulation applies primarily to owners of 53-foot or longer box-type trailers, including both dry-van and refrigerated-van trailers, and owners of the heavy-duty tractors that pull them on California highways. CARB's Heavy-Duty (Tractor-Trailer) Greenhouse Gas Regulation is available at: https://www.arb.ca.gov/cc/hdghg/hdghg.htm.

[4] The PSIP program requires that diesel and bus fleet owners conduct annual smoke opacity inspections of their vehicles and repair those with excessive smoke emissions to ensure compliance. CARB's PSIP program is available at: https://www.arb.ca.gov/enf/hdvip/hdvip.htm.

[5] The regulation requires newer heavier trucks and buses must meet particulate matter filter requirements beginning January 1, 2012. Lighter and older heavier trucks replaced starting January 1, 2015. By January 1, 2023, nearly all trucks and buses will need to have 2010 model year engines or equivalent. CARB's Statewide Truck and Bus Regulation is available at: https://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm.

Transmission Technical
Services Department

9400 Oakdale Ave
Chatsworth, CA 91311
SC9314

August 22, 2022

Matthew Hall
Kern County
hallmat@kerncounty.com

Subject: **Malibu Vineyards Industrial Parkway Project by Malibu Vineyards, L.P.; GPA 9, Map 80;**
GPA 23, Map 81; ZCC 13, Map 80; ZCC 92, Map 81; PD 2, Map 80; PD 74, Map 81; PD 75, Map 81

DCF: **1545-22NC**

The Transmission Department of SoCalGas does not operate any facilities within your proposed improvement. However, the Distribution Department of SoCalGas may maintain and operate facilities within your project scope.

To assure no conflict with the Distribution's pipeline system, please e-mail them at:

NorthwestDistributionUtilityRequest@semprautilities.com

Best Regards,
Nerses Papazyan
SoCalGas Transmission Technical Services
SoCalGasTransmissionUtilityRequest@semprautilities.com

August 8, 2022

Janice Mayes, Planner 3
Kern County Planning Department
2700 "M" Street, Suite 100
Bakersfield, CA 93301

Re: Draft EIR-Malibu Vineyards Industrial Parkway Project, Bakersfield

Dear Janice Mayes:

In review of the Draft Environmental Impact Report (EIR) I see reference to the County of Kern - Airport Land Use Compatibility Plan (ALUCP) map in Figure 7. I don't see any reference to the ALUCP in the Chapter 3 Section XI – Land Use and Planning.

Portions of this project appears to be in the B2 zone, C zone and under the flight pattern for the Meadows Field Airport as defined in the ALUCP. This area is subject to Residential and Other Use Density Restrictions and Open Land Requirements. In addition, there is a significant risk for development within the B2 zone as aircraft are commonly below 800 ft. above the ground, with associated significant aircraft noise.

Please make note that this is an area of concern because of the aircraft that use this flight pattern. This area is subject to over flight, noise, vibration, and will be subject to height, light and other restrictions as defined in the Federal Aviation Administration (FAA) Regulations and the ALUCP. FAA regulations may require that the applicant file Form 7460-1 with the Federal Aviation Administration for any development in this area. This can be accomplished by going to the web site https://oeaaa.faa.gov/oeaaa/external/portal.jsp. We would recommend that all building and lighting plans be presented to the Kern County Department of Airports for review and comment to avoid encroachment on airfield operations or compromising aviation safety. We also recommend the dedication of an avigation easement, as defined in the ALUCP, as part of this process to notify future tenants/owners that they are under the approach path for Meadows Field Airport and to ensure the safe and secure aircraft operations at Meadows Field.

Please contact me if you have any questions.

Respectfully,

Ron Brewster

Kern Council
of Governments

August 24, 2022

Mr. Matthew Hall
Kern County Planning and Natural Resources
2700 M Street, Suite 100
Bakersfield, California 93301

Re: NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT (EIR) FOR THE Malibu Vineyards Industrial Parkway Project, By Malibu Vineyards, L.P. (PP21116)

Dear Mr. Hall:

Kern Council of Governments (Kern COG) requests the EIR for the Malibu Vineyards Industrial Parkway Project, by Malibu Vineyards, L.P. (PP21116) set aside the indicated ROW on the enclosed map for this major regional transportation facility as identified in the Kern County Circulation Plan and in the Kern COG Kern Area Regional Goods-Movement Operations (KARGO) Phase I project. The following link is to the KARGO Study: https://www.kerncog.org/wp-content/uploads/2021/01/KARGO_P1_2021.pdf . Enclosed is a proposed layout for the future freeway to freeway interchange at SR-99 and the extension of the West Beltway now referred to as the West Urban Corridor. Please note the KARGO Phase 2 project is now underway and has resulted in a proposed revision to the County, Shafter, and Metropolitan Bakersfield circulation plan maps consistent with the enclosed KARGO Phase I ROW map. The KARGO Project Study is attempting to correct disruptions in this area created by the High Speed Rail project.

Thank you for considering this comment. If you have any questions, please feel free to contact me at rball@kerncog.org or 661-635-2902.

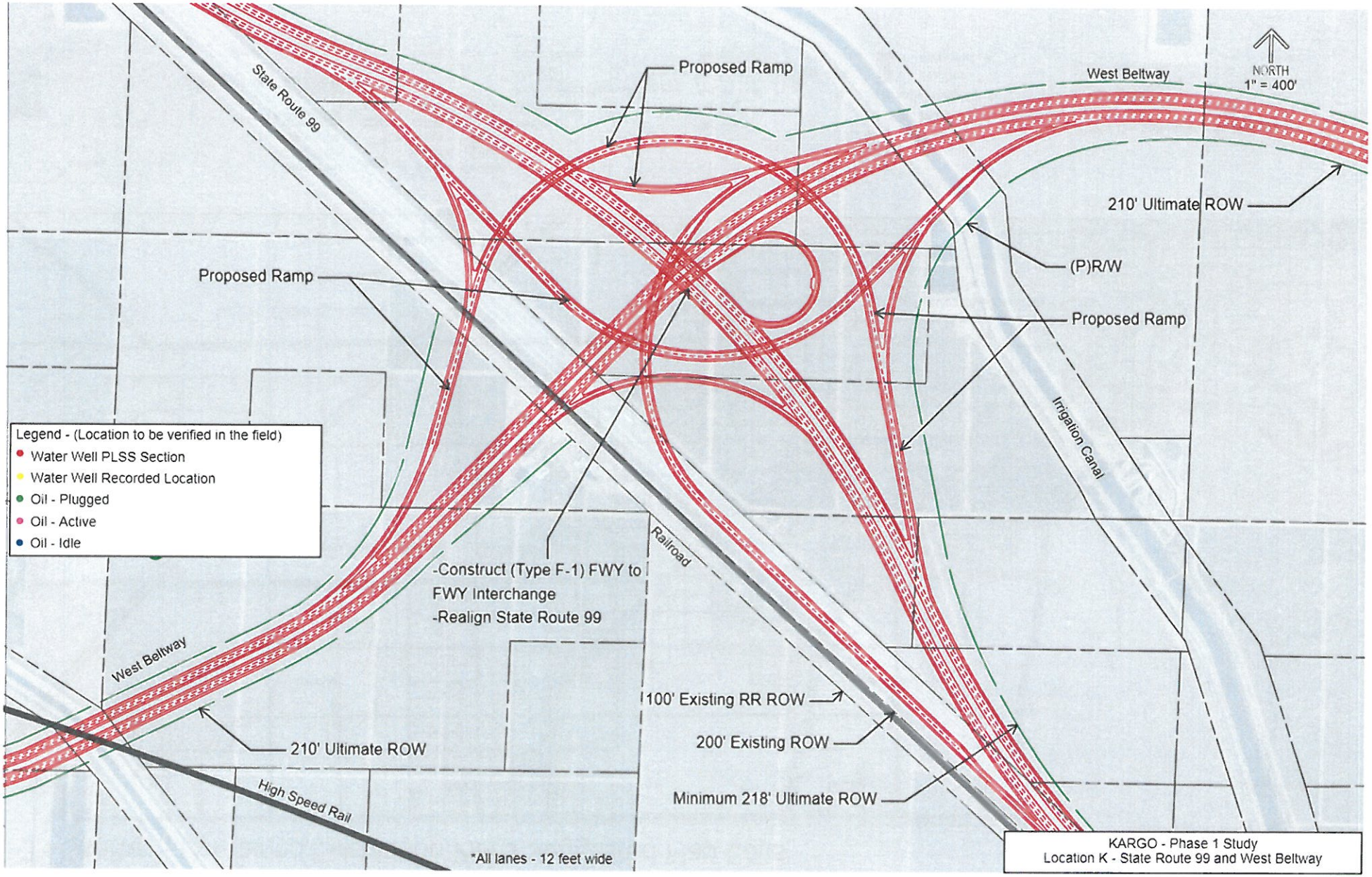
Sincerely,

Robert Ball
Deputy Director/Planning Director

Enclosures:

- Map of SR 99 / North-West Urban Corridor (formerly West Beltway) Future Freeway to Freeway Interchange – Phase I KARGO Study
- Map of KARGO Sustainability Study – Phase 2, Map C-3

SR 99 / North-West Urban Corridor (formerly West Beltway) Future Freeway to Freeway Interchange – Phase I KARGO Study



CITY OF SHAFTER

336 Pacific Avenue · Shafter, California 93263

August 24, 2022

Kern County Planning and Natural Resources Department
Attn: Matthew Hall, Supervising Planner
2700 "M" Street, Suite 100
Bakersfield, CA 93301

RE: Malibu Vineyards Industrial Parkway Project, By Malibu Vineyards, L.P. (PP21116) Notice of Preparation of an Environmental Impact Report

Dear Mr. Hall:

The City of Shafter Planning Department has reviewed the above-referenced Notice of Preparation of an Environmental Impact Report (NOP). On page 24 of the NOP, under the heading of "Proposed Discretionary Actions/Required Approvals," the City of Shafter Planning Department is listed as a public agency whose discretionary approval is required for the Malibu Vineyards Industrial Parkway Project (Project). Specifically, the NOP states that the City will need to perform the following:

- Sphere of Influence Amendment
- Municipal Services Review Update
- CEQA EIR
- Annexation w/ GPA

The attached map shows that the Project site is outside both the City limits and Sphere of Influence (SOI) boundary. Therefore, it is the City's belief that there is no need for a SOI Amendment or MSR Update. If the Lead Agency believes otherwise, please inform the City of its reasoning.

The map also shows that the Project site is within the City's General Plan Boundary and that all subject properties within the boundary are designated as A (Agriculture – Open Space) by the Shafter General Plan. However, a general plan is just a road map for development within an area, but it is the related zoning ordinance that provides the force of law. Title 17 (Zoning Ordinance) of the Shafter Municipal Code is limited to parcels within the City limits, and the Project is outside the limits. The Kern County General Plan has also designated areas within the City's General Plan Boundary that are associated with the Project.

Page 48 of the NOP states, "[t]he project is subject to the requirements of the Kern County General Plan, the Metropolitan Bakersfield General Plan, and the Kern County Zoning Ordinance." The City concurs that the Project must adhere to the requirements within these planning documents and does not require a General Plan Amendment from the City. Later, the City will be updating its

General Plan, and clean up of this area for consistency with existing and future uses will occur, or perhaps the City will shrink the General Plan Boundary to not overlap with the County's boundary.

The City is not sure why the NOP states that one of the City's discretionary approvals is a "CEQA EIR." The City would like the Lead Agency to clarify what is meant by including the phrase "CEQA EIR" as part of the required discretionary approvals.

Similarly, it is not clear what the Lead Agency means by "Annexation w/ GPA." The Project site is not within the City limits and the City currently has no intention of annexing the site into its limits. Therefore, an annexation is not needed. And, as discussed above, the GPA of the Kern County General Plan for the Project is the only one required for the Project, and another GPA from the City is not necessary. If the Lead Agency believes otherwise, please inform the City of its reasoning.

Thank you for the opportunity to comment. Please place my contact information on the list to be noticed throughout the environmental process for this Project.

Respectfully,

City of Shafter



Steve Esselman
Planning Director

Attachment

Shafter City Limits, SOI, GP Boundary



8/24/2022, 10:17:51 AM

Site

Shafter General Plan Boundary

SOI/City Limits

1:18,056

0 0.13 0.25 0.5 mi

0 0.2 0.4 0.8 km

Esri Community Maps Contributors, City of Shafter, California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS,

City of Shafter

Esri Community Maps Contributors, City of Shafter, California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, US Census Bureau, USDA | Copyright nearmap 2015 | City of Shafter |

CRAIG M. POPE, P.E., DIRECTOR
ADMINISTRATION & HUMAN RESOURCES
FINANCE & ENGINEERING
BUILDING & CODE
OPERATIONS

KERN COUNTY
PUBLIC WORKS

2700 "M" STREET, Suite 400
BAKERSFIELD, CA 93301-2370
Phone: (661) 862-5000
FAX: (661) 862-8851
Toll Free: (800) 552-5376 Option 5
TTY Relay: (800) 735-2929

August 29, 2022

To: Lorelei Oviatt, Director
Planning and Natural Resources Department

Janice Mayes, Planner III

From: Brian Blacklock, County Surveyor
By: Andres Arias, Engineering Tech III Phone: 28959

Subject: Notice of Preparation of Draft Environmental Impact Report for Malibu Vineyards Industrial Parkway Project by Malibu Vineyards, LP. (PP21116)

I have reviewed the above noted project Notice of Preparation of DEIR and recommend the following conditions be placed on the Conditional Use Permits:

1. Prior to issuance of a building or grading permit: All survey monuments shall be tied out by a Licensed Land Surveyor. A corner record for each monument or record of survey shall be submitted to the County Surveyor for review and processing, per Section 8771 of the Professional Land Surveyor's (PLS) Act.

2. Prior to Final Inspection: All survey monuments that were destroyed during construction shall be re-set or have a suitable witness corner set. A post construction corner record for each monument re-set or a record of survey shall be submitted to the County Surveyor for processing, per Section 8771 of the Professional Land Surveyor's Act.

3. Upon completion of project: All survey monuments shall be accessible by a Licensed Land Surveyor or their representatives, with prior notice, per Section 8774 of the PLS Act and Civil Code 846.5 (a).

Thank you for the opportunity to review and comment on this project. Should you have any questions please contact me.

Office of the Fire Marshal
Kern County Fire Department
Fire Prevention Unit

2820 M St. • Bakersfield, CA 93301 • www.kerncountyfire.org
Telephone 661-391-3310 • FAX 661-636-0466/67 • TTY Relay 800-735-2929

September 5, 2022

Kern County Planning and Natural Resources Department
2800 M St., Bakersfield, CA 93301
Attn: **Matthew Hall, Supervising Planner**

Re: Draft EIR Malibu Vineyards Industrial Parkway Project (PP21116)

To Whom It May Concern:

The Kern County Fire Department (KCFD), as the local fire authority, has received a request for comments regarding Malibu Vineyards Industrial Parkway Project (PP21116). Upon initial review it has been determined,

All new construction will conform to California Fire Code and local ordinance,
All new construction will require dedicated fire water flow 1500gpm for 2hrs minimum, with 20psi residual located within 400' of the furthest point of the project,
All new construction of this type requires hydrant spacing at a maximum distance of 330'.
All new construction requires adequate emergency vehicle site access.
All new construction shall meet all other fire requirements of the California Fire Code and related local fire ordinance.

In our review of the proposed project, we determined the over 8,000,000 square feet of industrial space, 135' high cube storage, influx of 5 – 6,000 employees, automobile traffic and commercial truck traffic will impact fire service. The closest three fire stations are in north Bakersfield.
Station 61, located at 6400 Fruitvale Avenue is approximately 7 miles from the project site.
Station 63, located at 101 Universe Avenue is approximately 7 miles from the project site.
Station 64, located at 101 E. Roberts Lane is approximately 9 miles from the project site.
The fire stations nearest the project site are currently impacted by high call volume leaving a service area gap for the proposed project.

A more detailed review and project comments will be conducted when the building permit is pulled, and plans are submitted to KCFD.

Please feel free to call our Fire Prevention Office at (661) 391-3310 with any questions.

Respectfully,
Kain Linville
Fire Marshal

klinville@kerncountyfire.org
Kern County Fire Department

CAWELO WATER DISTRICT

17207 Industrial Farm Road
Bakersfield, CA 93308
Phone: (661) 393-6072
Fax: (661) 393-6073
officeadmin@cawelowd.org

David R. Ansolabehere, General Manager

12 September 2022

Kern County Planning and Natural Resources Department
Attn: Matthew Hall, Supervising Planner
2700 "M" Street, Suite 100
Bakersfield, CA 93301

Subject: **Notice of Preparation of a Draft Environmental Impact Report (EIR) for the Malibu Vineyards Industrial Parkway Project, By Malibu Vineyards, L.P. (PP21116)**

Dear Mr. Hall:

Cawelo Water District (Cawelo) appreciates the opportunity to provide comments to the Notice of Preparation of a Draft Environmental Impact Report (EIR) for the Malibu Vineyards Industrial Parkway Project. Cawelo has reviewed the Notice of Preparation of a Draft Environmental Impact Report (EIR) for the Malibu Vineyards Industrial Parkway Project dated August 3, 2022. Cawelo understands that the Notice of Preparation of a Draft EIR is the initial stage of the environmental documents that will be prepared for this project and Cawelo wanted to provide its initial feedback on the project.

1. **Section 1.3, Site Access and Internal Circulation, p.20**
   Cawelo is concerned with the design of future Burbank Street arterial or Future Expressway. The proposed route of future Burbank Street or Future Expressway would cross over Cawelo's main 60" Reinforced Concrete Pipe (RCP) pipeline that is 50 years old and not designed for traffic loads and would restrict access to Cawelo's facilities. Cawelo must be considered in the design of Future Burbank Street or Future Expressway so Cawelo can continue to operate its facilities now and in the future.

2. **Section 1.3, Water and Wastewater, p. 21**

   Water service for this project would be provided by Oildale Mutual Water Company (OMWC) and it is stated that the project area would need to be annexed into OMWC's

service area. The project area is located in the Cawelo Water District which is an agricultural water district and the water proposed by OMWC for this project would come from Agricultural water allocated to this area.

Cawelo appreciates the opportunity to provide comments to the Notice of Preparation of a Draft Environmental Impact Report (EIR) for the Malibu Vineyards Industrial Parkway Project and will continue to work in cooperation with Kern County Planning and Natural Resources Department. If you have any questions, please contact my office.

Sincerely,

David R. Ansolabehere,
General Manager
Cawelo Water District

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING

September 22, 2022

Matthew Hall
County of Kern
Planning and Natural Resources Department
2700 “M” Street, Suite 100
Bakersfield, CA 93301

Project: Notice of Preparation of a Draft Environmental Impact Report – Malibu Vineyards Industrial Parkway Project (PP21116)

District CEQA Reference No: 20221087

Dear Mr. Hall:

The San Joaquin Valley Air Pollution Control District (District) has reviewed the Notice of Preparation of a Draft Environmental Impact Report (EIR) from the County of Kern (County) for the Malibu Vineyards Industrial Parkway project. Per the EIR, the project consists of the development of an industrial park with approximately 8,907,446 square feet of industrial warehouse and office use space on approximately 739 acres (Project). The Project is located north of Imperial Avenue and generally east of State Route 99, with site access from Saco Road and Imperial Avenue, in Kern County.

The District offers the following comments regarding the Project:

1) Project Related Emissions

At the federal level under the National Ambient Air Quality Standards (NAAQS), the District is designated as extreme nonattainment for the 8-hour ozone standards and serious nonattainment for the particulate matter less than 2.5 microns in size (PM2.5) standards. At the state level under California Ambient Air Quality Standards (CAAQS), the District is designated as nonattainment for the 8-hour ozone, PM10, PM2.5 standards.

The District’s initial review of the Project concludes that emissions resulting from construction and/or operation of the Project may exceed any of the following significance thresholds as identified in the District’s Guidance for Assessing and Mitigating Air Quality Impacts: https://www.valleyair.org/transportation/GAMAQI.pdf.

Samir Sheikh
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: (661) 392-5500 FAX: (661) 392-5585

www.valleyair.org www.healthyairliving.com

Printed on recycled paper.

The District recommends that a more detailed preliminary review of the Project be conducted for the Project's construction and operational emissions.

1a) Construction Emissions

The District recommends, to reduce impacts from construction-related diesel exhaust emissions, the Project should utilize the cleanest available off-road construction equipment, including the latest tier equipment.

1b) Operational Emissions

Operational (ongoing) air emissions from mobile sources and stationary sources should be analyzed separately. For reference, the District's significance thresholds are identified in the District's Guidance for Assessing and Mitigating Air Quality Impacts: https://www.valleyair.org/transportation/GAMAQI.pdf.

Since the Project consists of an industrial park, the Project is expected to generate an increase in Heavy Heavy-Duty (HHD) truck trips. The District recommends the EIR include a project-specific qualitative and/or quantitative discussion to support or justify an appropriate trip length for the HHD truck trips, since they may be traveling relatively longer distances.

Recommended Mitigation Measure: At a minimum, project related impacts on air quality should be reduced to levels of significance through incorporation of design elements such as the use of cleaner HHD trucks and vehicles, measures that reduce Vehicle Miles Traveled (VMTs), and measures that increase energy efficiency. More information on transportation mitigation measures can be found at: http://www.valleyair.org/transportation/Mitigation-Measures.pdf.

1c) Recommended Model for Quantifying Air Emissions

Project-related criteria pollutant emissions from construction and operational sources should be identified and quantified. Emissions analysis should be performed using the California Emission Estimator Model (CalEEMod), which uses the most recent CARB-approved version of relevant emissions models and emission factors. CalEEMod is available to the public and can be downloaded from the CalEEMod website at: www.caleemod.com.

2) Health Risk Screening/Assessment

The County should evaluate the risk associated with the Project for sensitive receptors (residences, businesses, hospitals, day-care facilities, health care facilities, etc.) in the area and mitigate any potentially significant risk to help limit exposure of sensitive receptors to emissions.

To determine potential health impacts on surrounding receptors (residences, businesses, hospitals, day-care facilities, health care facilities, etc.) a Prioritization and/or a Health Risk Assessment (HRA) should be performed for the Project. These health risk determinations should quantify and characterize potential Toxic Air Contaminants (TACs) identified by the Office of Environmental Health Hazard Assessment/California Air Resources Board (OEHHA/CARB) that pose a present or potential hazard to human health.

Health risk analyses should include all potential air emissions from the project, which include emissions from construction of the project, including multi-year construction, as well as ongoing operational activities of the project. Note, two common sources of TACs can be attributed to diesel exhaust emitted from heavy-duty off-road earth moving equipment during construction, and from ongoing operation of heavy-duty on-road trucks.

Prioritization (Screening Health Risk Assessment):
A "Prioritization" is the recommended method for a conservative screening-level health risk assessment. The Prioritization should be performed using the California Air Pollution Control Officers Association's (CAPCOA) methodology.

The District recommends that a more refined analysis, in the form of an HRA, be performed for any project resulting in a Prioritization score of 10 or greater. This is because the prioritization results are a conservative health risk representation, while the detailed HRA provides a more accurate health risk evaluation.

To assist land use agencies and project proponents with Prioritization analyses, the District has created a prioritization calculator based on the aforementioned CAPCOA guidelines, which can be found here:
http://www.valleyair.org/busind/pto/emission_factors/Criteria/Toxics/Utilities/PRIORITIZATION-CALCULATOR.xls

Health Risk Assessment:
Prior to performing an HRA, it is strongly recommended that land use agencies/ project proponents develop and submit for District review a health risk modeling protocol that outlines the sources and methodologies that will be used to perform the HRA. This step will ensure all components are addressed when performing the HRA.

A development project would be considered to have a potentially significant health risk if the HRA demonstrates that the project-related health impacts would exceed the District's significance threshold of 20 in a million for carcinogenic risk, or 1.0 for either the Acute or Chronic Hazard Indices.

A project with a significant health risk would trigger all feasible mitigation measures. The District strongly recommends that development projects that result in a significant health risk not be approved by the land use agency.

The District is available to review HRA protocols and analyses. For HRA submittals please provide the following information electronically to the District for review:

- HRA (AERMOD) modeling files
- HARP2 files
- Summary of emissions source locations, emissions rates, and emission factor calculations and methodologies.

For assistance, please contact the District's Technical Services Department by:

- E-Mailing inquiries to: hramodeler@valleyair.org
- Calling (559) 230-5900

Recommended Measure: Development projects resulting in TAC emissions should be located an adequate distance from residential areas and other sensitive receptors in accordance to CARB's Air Quality and Land Use Handbook: A Community Health Perspective located at https://ww3.arb.ca.gov/ch/handbook.pdf.

3) Ambient Air Quality Analysis

An Ambient Air Quality Analysis (AAQA) uses air dispersion modeling to determine if emissions increases from a project will cause or contribute to a violation of State or National Ambient Air Quality Standards. The District recommends an AAQA be performed for the Project if emissions exceed 100 pounds per day of any pollutant.

An acceptable analysis would include emissions from both project-specific permitted and non-permitted equipment and activities. The District recommends consultation with District staff to determine the appropriate model and input data to use in the analysis.

Specific information for assessing significance, including screening tools and modeling guidance, is available online at the District's website: www.valleyair.org/ceqa.

4) Voluntary Emission Reduction Agreement

Criteria pollutant emissions may result in emissions exceeding the District's significance thresholds, potentially resulting in a significant impact on air quality. When a project is expected to have a significant impact, the District recommends the EIR also include a discussion on the feasibility of implementing a Voluntary Emission Reduction Agreement (VERA) for this Project.

A VERA is a mitigation measure by which the project proponent provides pound-for-pound mitigation of emissions increases through a process that develops, funds, and implements emission reduction projects, with the District serving a role of administrator of the emissions reduction projects and verifier of the successful mitigation effort. To implement a VERA, the project proponent and the District enter into a contractual agreement in which the project proponent agrees to mitigate project specific emissions by providing funds for the District's incentives programs. The funds are disbursed by the District in the form of grants for projects that achieve emission reductions. Thus, project-related impacts on air quality can be mitigated. Types of emission reduction projects that have been funded in the past include electrification of stationary internal combustion engines (such as agricultural irrigation pumps), replacing old heavy-duty trucks with new, cleaner, more efficient heavy-duty trucks, and replacement of old farm tractors.

In implementing a VERA, the District verifies the actual emission reductions that have been achieved as a result of completed grant contracts, monitors the emission reduction projects, and ensures the enforceability of achieved reductions. After the project is mitigated, the District certifies to the Lead Agency that the mitigation is completed, providing the Lead Agency with an enforceable mitigation measure demonstrating that project-related emissions have been mitigated. To assist the Lead Agency and project proponent in ensuring that the environmental document is compliant with CEQA, the District recommends the environmental document includes an assessment of the feasibility of implementing a VERA.

5) Industrial/Warehouse Emission Reduction Strategies

The District recommends the County consider the feasibility of incorporating emission reduction strategies that can reduce potential harmful health impacts, such as those listed below:

- Ensure solid screen buffering trees, solid decorative walls, and/or other natural ground landscaping techniques are implemented along the property line of adjacent sensitive receptors
- Ensure all landscaping be drought tolerant
- Orient loading docks away from sensitive receptors unless physically impossible

- Locate loading docks a minimum of 300 feet away from the property line of sensitive receptor unless dock is exclusively used for electric trucks
- Incorporate signage and “pavement markings” to clearly identify on-site circulation patterns to minimize unnecessary on-site vehicle travel
- Locate truck entries on streets of a higher commercial classification
- Ensure all building roofs are solar-ready
- Ensure all portions of roof tops that are not covered with solar panels are constructed to have light colored roofing material with a solar reflective index of greater than 78
- Ensure rooftop solar panels are installed and operated to supply 100% of the power needed to operate all non-refrigerated portions of the development project
- Ensure power sources at loading docks for all refrigerated trucks have “plugin” capacity, which will eliminate prolonged idling while loading and unloading goods
- Incorporate bicycle racks and electric bike plug-ins
- Require the use of low volatile organic compounds (VOC) architectural and industrial maintenance coatings
- Designate an area during construction to charge electric powered construction vehicles and equipment, if temporary power is available
- Prohibit the use of non-emergency diesel-powered generators during construction
- Inform the project proponent of the incentive programs (e.g., Carl Moyer Program and Voucher Incentive Program) offered to reduce air emissions from the Project

6) Truck Routing

Truck routing involves the assessment of which roads Heavy Heavy-Duty (HHD) trucks take to and from their destination, and the emissions impact that the HHD trucks may have on residential communities and sensitive receptors. Since the Project consists of the construction of an industrial park, the Project is expected to generate an increase in HHD truck trips.

The District recommends the County evaluate HHD truck routing patterns for the Project, with the aim of limiting exposure of residential communities and sensitive receptors to emissions. This evaluation would consider the current truck routes, the quantity and type of each truck (e.g., Medium Heavy-Duty, HHD, etc.), the destination and origin of each trip, traffic volume correlation with the time of day or the day of the week, overall Vehicle Miles Traveled (VMT), and associated exhaust emissions. The truck routing evaluation would also identify alternative truck routes and their impacts on VMT and air quality.

7) Cleanest Available Heavy-Duty Trucks

The San Joaquin Valley will not be able to attain stringent health-based federal air quality standards without significant reductions in emissions from HHD trucks, the single largest source of NOx emissions in the San Joaquin Valley. The District's CARB-approved 2018 PM2.5 Plan includes significant new reductions from HHD trucks, including emissions reductions by 2023 through the implementation of CARB's Statewide Truck and Bus Regulation, which requires truck fleets operating in California to meet the 2010 standard of 0.2 g-NOx/bhp-hr by 2023. Additionally, to meet federal air quality attainment standards, the District's Plan relies on a significant and immediate transition of HHD fleets to zero or near-zero emissions technologies, including the near-zero truck standard of 0.02 g/bhp-hr NOx established by CARB.
The Project consists of an industrial park which is expected to generate an increase in HHD truck trips traveling to-and-from the project location at longer distribution trip length distances. Since the Project may exceed the District significance thresholds, the District recommends that the following measures be considered by the County to reduce Project-related operational emissions:

- *Recommended Measure*: Fleets associated with operational activities utilize the cleanest available HHD trucks, including zero and near-zero (0.02 g/bhp-hr NOx) technologies.

- *Recommended Measure*: All on-site service equipment (cargo handling, yard hostlers, forklifts, pallet jacks, etc.) utilize zero-emissions technologies.

8) Reduce Idling of Heavy-Duty Trucks

The goal of this strategy is to limit the potential for localized PM2.5 and toxic air contaminant impacts associated with the idling of Heavy-Duty trucks. The diesel exhaust from idling has the potential to impose significant adverse health and environmental impacts.

Since the Project is expected to result in HHD truck trips, the District recommends the EIR include measures to ensure compliance of the state anti-idling regulation (13 CCR § 2485 and 13 CCR § 2480) and discuss the importance of limiting the amount of idling, especially near sensitive receptors. In addition, the District recommends the County consider the feasibility of implementing a more stringent 3-minute idling restriction and requiring appropriate signage and enforcement of idling restrictions.

9) Electric On-Site Off-Road and On-Road Equipment

Since the development project is expected to include Heavy Industrial and Light Industrial uses, the Project may have the potential to result in increased use of off-road equipment (e.g., forklifts) and on-road equipment (e.g., mobile yard trucks with

the ability to move materials). The District recommends that the EIR include requirements for project proponents to utilize electric or zero emission off-road and on-road equipment.

10) Vegetative Barriers and Urban Greening

There is a residential development located nearby to the west of the Project. The District suggests the County consider the feasibility of incorporating vegetative barriers and urban greening as a measure to further reduce air pollution exposure on sensitive receptors (e.g., residential units).

While various emission control techniques and programs exist to reduce air quality emissions from mobile and stationary sources, vegetative barriers have been shown to be an additional measure to potentially reduce a population's exposure to air pollution through the interception of airborne particles and the update of gaseous pollutants. Examples of vegetative barriers include, but are not limited to the following: trees, bushes, shrubs, or a mix of these. Generally, a higher and thicker vegetative barrier with full coverage will result in greater reductions in downwind pollutant concentrations. In the same manner, urban greening is also a way to help improve air quality and public health in addition to enhancing the overall beautification of a community with drought tolerant, low-maintenance greenery.

11) On-Site Solar Deployment

It is the policy of the State of California that renewable energy resources and zero-carbon resources supply 100% of retail sales of electricity to California end-use customers by December 31, 2045. While various emission control techniques and programs exist to reduce air quality emissions from mobile and stationary sources, the production of solar energy is contributing to improving air quality and public health. The District suggests that the County consider incorporating solar power systems as an emission reduction strategy for the Project.

12) Electric Vehicle Chargers

To support and accelerate the installation of electric vehicle charging equipment and development of required infrastructure, the District offers incentives to public agencies, businesses, and property owners of multi-unit dwellings to install electric charging infrastructure (Level 2 and 3 chargers). The purpose of the District's Charge Up! Incentive program is to promote clean air alternative-fuel technologies and the use of low or zero-emission vehicles. The District recommends that the County and project proponents install electric vehicle chargers at project sites, and at strategic locations.

Please visit www.valleyair.org/grants/chargeup.htm for more information.

13) District Rules and Regulations

The District issues permits for many types of air pollution sources, and regulates some activities that do not require permits. A project subject to District rules and regulations would reduce its impacts on air quality through compliance with the District's regulatory framework. In general, a regulation is a collection of individual rules, each of which deals with a specific topic. As an example, Regulation II (Permits) includes District Rule 2010 (Permits Required), Rule 2201 (New and Modified Stationary Source Review), Rule 2520 (Federally Mandated Operating Permits), and several other rules pertaining to District permitting requirements and processes.

The list of rules below is neither exhaustive nor exclusive. Current District rules can be found online at: www.valleyair.org/rules/1ruleslist.htm. To identify other District rules or regulations that apply to future projects, or to obtain information about District permit requirements, the project proponents are strongly encouraged to contact the District's Small Business Assistance (SBA) Office at (661) 392-5665.

13a) District Rules 2010 and 2201 - Air Quality Permitting for Stationary Sources

Stationary Source emissions include any building, structure, facility, or installation which emits or may emit any affected pollutant directly or as a fugitive emission. District Rule 2010 (Permits Required) requires operators of emission sources to obtain an Authority to Construct (ATC) and Permit to Operate (PTO) from the District. District Rule 2201 (New and Modified Stationary Source Review) requires that new and modified stationary sources of emissions mitigate their emissions using Best Available Control Technology (BACT).

This Project may be subject to District Rule 2010 (Permits Required) and Rule 2201 (New and Modified Stationary Source Review) and may require District permits. Prior to construction, the Project proponent should submit to the District an application for an ATC. For further information or assistance, the project proponent may contact the District's SBA Office at (661) 392-5665.

13b) District Rule 9510 - Indirect Source Review (ISR)

The Project is subject to District Rule 9510 because it will receives a project-level discretionary approval from a public agency and will equal or exceed 25,000 square feet of light industrial development.

The purpose of District Rule 9510 is to reduce the growth in both NOx and PM emissions associated with development and transportation projects from mobile and area sources; specifically, the emissions associated with the construction

and subsequent operation of development projects. The ISR Rule requires developers to mitigate their NOx and PM emissions by incorporating clean air design elements into their projects. Should the proposed development project clean air design elements be insufficient to meet the required emission reductions, developers must pay a fee that ultimately funds incentive projects to achieve off-site emissions reductions.

Per Section 5.0 of the ISR Rule, an Air Impact Assessment (AIA) application is required to be submitted no later than applying for project-level approval from a public agency. As of the date of this letter, the District has not received an AIA application for this Project. Please inform the project proponent to immediately submit an AIA application to the District to comply with District Rule 9510. One AIA application should be submitted for the entire Project. It is preferable for the applicant to submit an AIA application as early as possible in the County's approval process so that proper mitigation and clean air design under ISR can be incorporated into the County's analysis.

Information about how to comply with District Rule 9510 can be found online at: http://www.valleyair.org/ISR/ISRHome.htm.

The AIA application form can be found online at: http://www.valleyair.org/ISR/ISRFormsAndApplications.htm.

District staff is available to provide assistance and can be reached by phone at (559) 230-5900 or by email at ISR@valleyair.org.

13c) District Rule 9410 (Employer Based Trip Reduction)

The Project may be subject to District Rule 9410 (Employer Based Trip Reduction) if the project would result in employment of 100 or more "eligible" employees. District Rule 9410 requires employers with 100 or more "eligible" employees at a worksite to establish an Employer Trip Reduction Implementation Plan (eTRIP) that encourages employees to reduce single-occupancy vehicle trips, thus reducing pollutant emissions associated with work commutes. Under an eTRIP plan, employers have the flexibility to select the options that work best for their worksites and their employees.

Information about District Rule 9410 can be found online at: www.valleyair.org/tripreduction.htm.

For additional information, you can contact the District by phone at 559-230-6000 or by e-mail at etrip@valleyair.org

13d) District Rule 4601 (Architectural Coatings)

The Project may be subject to District Rule 4601 since it may utilize architectural coatings. Architectural coatings are paints, varnishes, sealers, or stains that are applied to structures, portable buildings, pavements or curbs. The purpose of this rule is to limit VOC emissions from architectural coatings. In addition, this rule specifies architectural coatings storage, cleanup and labeling requirements. Additional information on how to comply with District Rule 4601 requirements can be found online at: http://www.valleyair.org/rules/currntrules/r4601.pdf

13e) District Regulation VIII (Fugitive PM10 Prohibitions)

The project proponent may be required to submit a Construction Notification Form or submit and receive approval of a Dust Control Plan prior to commencing any earthmoving activities as described in Regulation VIII, specifically Rule 8021 – *Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities.*

Should the project result in at least 1-acre in size, the project proponent shall provide written notification to the District at least 48 hours prior to the project proponents intent to commence any earthmoving activities pursuant to District Rule 8021 (Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities). Also, should the project result in the disturbance of 5-acres or more, or will include moving, depositing, or relocating more than 2,500 cubic yards per day of bulk materials, the project proponent shall submit to the District a Dust Control Plan pursuant to District Rule 8021 (Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities). For additional information regarding the written notification or Dust Control Plan requirements, please contact District Compliance staff at (559) 230-5950.

The application for both the Construction Notification and Dust Control Plan can be found online at:
https://www.valleyair.org/busind/comply/PM10/forms/DCP-Form.docx

Information about District Regulation VIII can be found online at:
http://www.valleyair.org/busind/comply/pm10/compliance_pm10.htm

13f) Other District Rules and Regulations

The Project may also be subject to the following District rules: Rule 4102 (Nuisance) and Rule 4641 (Cutback, Slow Cure, and Emulsified Asphalt, Paving and Maintenance Operations).

District Comment Letter

The District recommends that a copy of the District's comments be provided to the Project proponent.

If you have any questions or require further information, please contact Michael Corder by e-mail at Michael.Corder@valleyair.org or by phone at (559) 230-5818.

Sincerely,

Brian Clements
Director of Permit Services



For: Mark Montelongo
Program Manager

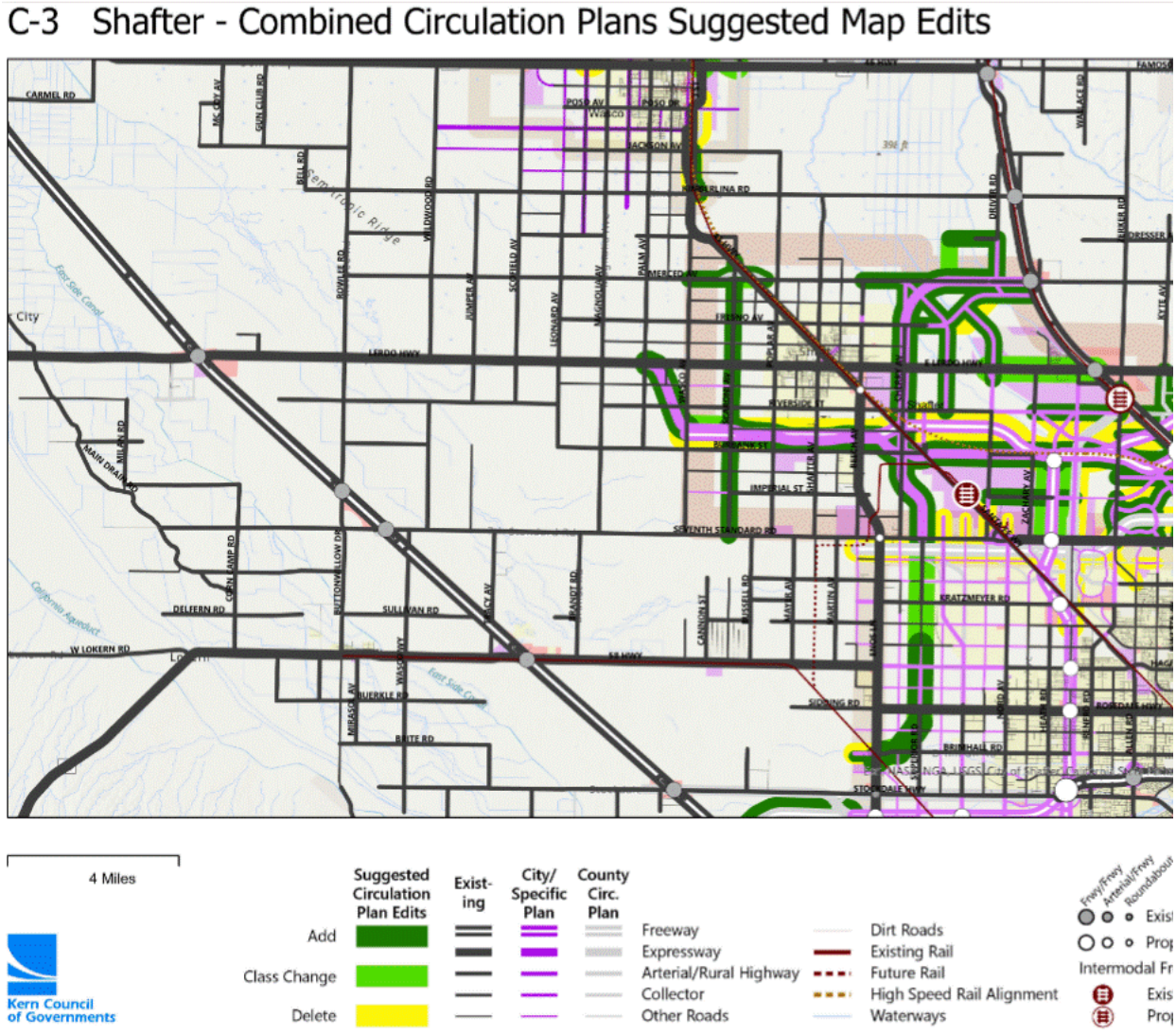
From: Rob Ball <RBall@kerncog.org>
Sent: Tuesday, August 23, 2022 6:01 PM
To: Matthew Hall
Cc: Joshua Champlin; Ahron Hakimi; 'sesselman@shafter.com'; Kevin Harmon; Fatemeh Ranaiefar; Lorelei Oviatt; Ahron Hakimi; Samuel Lux; BRaymond; BNapier
Subject: EIR NOP Comment: Malibu Vineyards, L.P. (PP21116) - 99-W. Beltway Interchange ROW - Phase I KARGO Study
Attachments: 99 - Burbank Corridor Interchange RoW.docx

CAUTION: This email originated from outside of the organization. Do not click links, open attachments, or provide information unless you recognize the sender and know the content is safe.

Mr. Hall – As discussed on the phone today, attached is a proposed layout for the future freeway to freeway interchange at 99 and the extension of the West Beltway now referred to as the West Urban Corridor. Kern COG requests the EIR for the Malibu Vineyards Industrial Parkway Project, by Malibu Vineyards, L.P. (PP21116) set aside the indicated ROW on the attached map for this major regional transportation facility in the County Circulation Plan as identified in the Kern COG KARGO phase I project https://www.kerncog.org/wp-content/uploads/2021/01/KARGO_P1_2021.pdf . Note that the Phase 2 KARGO project now underway has resulted in a proposed revision to the County, Shafter and Metropolitan Bakersfield circulation plan maps consistent with the phase I KARGO ROW map (below). The KARGO Study is attempting to correct disruptions in this area created by the HSR project. Thanks for considering this comment.

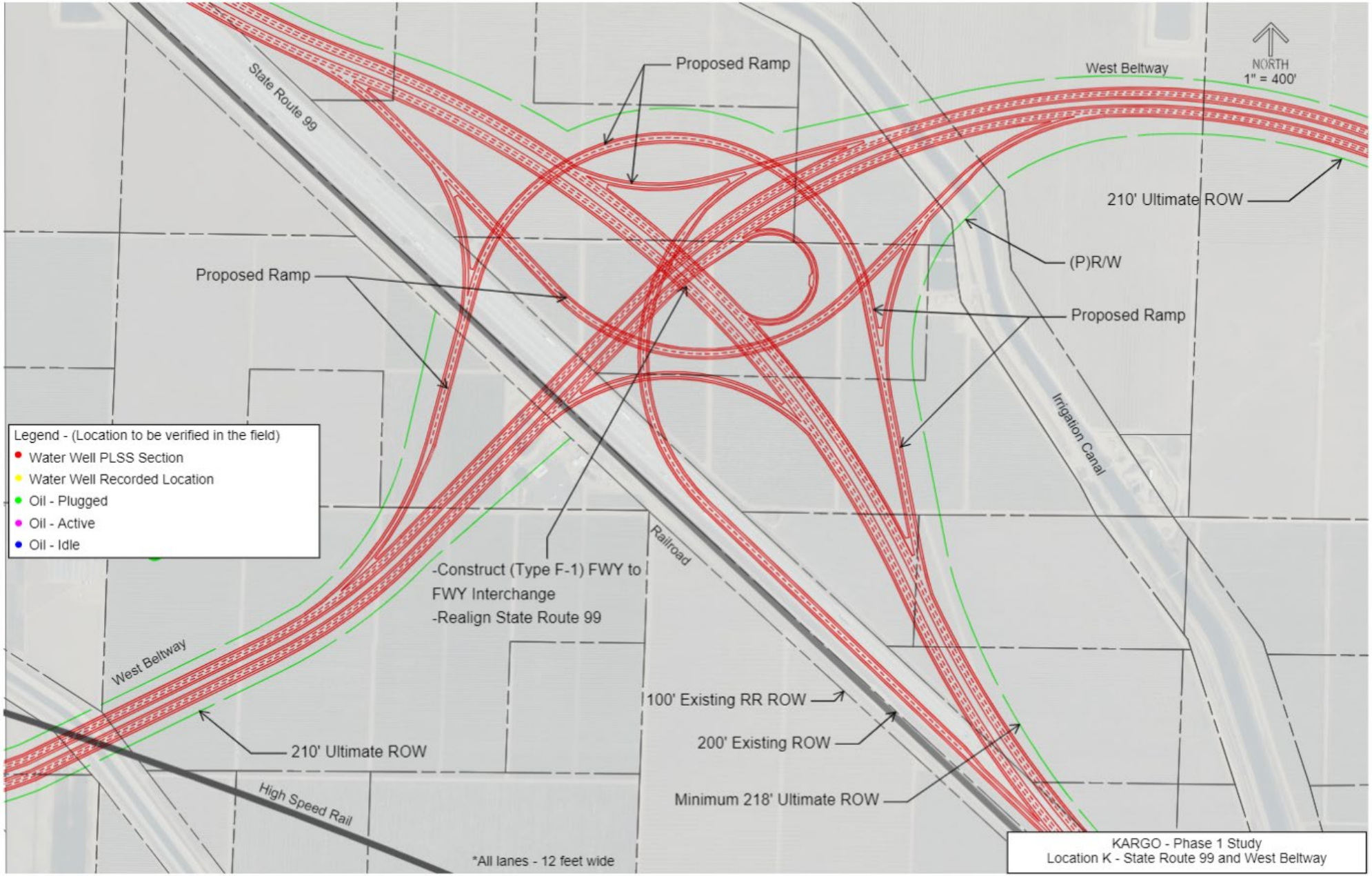
Kern Area Regional Goods-movement Operations (KARGO) Sustainability Study – Phase 2, Map C-3

CircMaps 8-16-2022.pdf



Robert "Rob" Ball, Deputy Director/Planning Director, Kern Council of Governments – rball@kerncog.org 661-635-2902

SR 99 / North-West Urban Corridor (formerly West Belteway) Future Freeway to Freeway Interchange – Phase I KARGO Study



September 1, 2022

VIA EMAIL: HALLMAT@KERNCOUNTY.COM
Matthew Hall
Supervising Planner
Kern County Planning and Natural Resources Department
2700 M Street Suite 100
Bakersfield, CA 93301

Dear Mr. Hall:

NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE MALIBU VINEYARDS INDUSTRIAL PARKWAY PROJECT, SCH# 2022080056

The Department of Conservation's (Department) Division of Land Resource Protection (Division) has reviewed the Notice of Preparation of a Draft Environmental Impact Report for the Malibu Vineyards Industrial Parkway Project (Project). The Division monitors farmland conversion on a statewide basis, provides technical assistance regarding the Williamson Act, and administers various agricultural land conservation programs. We offer the following comments and recommendations with respect to the project's potential impacts on agricultural land and resources.

Project Description

The proposed Malibu Vineyards Industrial Parkway Project involves the development of approximately 8,786,734 square feet of industrial use space, comprised of 24 buildings on approximately 739 acres of existing vineyard. The project is proposed by Malibu Vineyards, L.P. (project proponent), and would be developed over two phases.

The project site is located within unincorporated Kern County, north of Imperial Avenue and generally east of State Route 99 (SR 99), with site access from Saco Road and Imperial Avenue. The project site is just east of the City of Shafter, which is on the west side of SR 99, and approximately one mile north of the City of Bakersfield.

Department Comments

The conversion of agricultural land represents a permanent reduction and significant impact to California's agricultural land resources. CEQA requires that all feasible and reasonable mitigation be reviewed and applied to projects. Under CEQA, a lead agency should not approve a project if there are feasible alternatives or feasible mitigation measures available that would lessen the significant effects of the project.

All mitigation measures that are potentially feasible should be included in the project's environmental review. A measure brought to the attention of the lead agency should not be left out unless it is infeasible based on its elements.

Consistent with CEQA Guidelines, the Department recommends the County consider agricultural conservation easements, among other measures, as potential mitigation. (See Cal. Code Regs., tit. 14, § 15370 [mitigation includes "compensating for the impact by replacing or providing substitute resources or environments, including through permanent protection of such resources in the form of conservation easements."])

Mitigation through agricultural easements can take at least two forms: the outright purchase of easements or the donation of mitigation fees to a local, regional, or statewide organization or agency whose purpose includes the acquisition and stewardship of agricultural easements. The conversion of agricultural land should be deemed an impact of at least regional significance. Hence, the search for replacement lands should not be limited strictly to lands within the project's surrounding area.

A helpful source for regional and statewide agricultural mitigation banks is the California Council of Land Trusts. They provide helpful insight into farmland mitigation policies and implementation strategies, including a guidebook with model policies and a model local ordinance. The guidebook can be found at:

California Council of Land Trusts

Of course, the use of conservation easements is only one form of mitigation that should be considered. Any other feasible mitigation measures should also be considered. Indeed, the recent judicial opinion in King and Gardiner Farms, LLC v. County of Kern (2020) 45 Cal.App.5th 814 ("KG Farms") holds that agricultural conservation easements on a 1 to 1 ratio are not alone sufficient to adequately mitigate a project's conversion of agricultural land. KG Farms does not stand for the proposition that agricultural conservation easements are irrelevant as mitigation. Rather, the holding suggests that to the extent they are considered, they may need to be applied at a greater than 1 to 1 ratio, or combined with other forms of mitigation (such as restoration of some land not currently used as farmland).

Conclusion

The Department recommends further discussion of the following issues:

- Type, amount, and location of farmland conversion resulting directly and indirectly from implementation of the proposed project.
- Impacts on any current and future agricultural operations in the vicinity; e.g., land-use conflicts, increases in land values and taxes, loss of agricultural support infrastructure such as processing facilities, etc.

- Incremental impacts leading to cumulative impacts on agricultural land. This would include impacts from the proposed project, as well as impacts from past, current, and likely future projects.
- Proposed mitigation measures for all impacted agricultural lands within the proposed project area.

Thank you for giving us the opportunity to comment on the Notice of Preparation of a Draft Environmental Impact Report for the Malibu Vineyards Industrial Parkway Project. Please provide this Department with notices of any future hearing dates as well as any staff reports pertaining to this project. If you have any questions regarding our comments, please contact Farl Grundy, Associate Environmental Planner via email at Farl.Grundy@conservation.ca.gov.

Sincerely,

Monique Wilber

Monique Wilber

Conservation Program Support Supervisor

California Department of Transportation

DISTRICT 6 OFFICE
1352 WEST OLIVE AVENUE |P.O. BOX 12616 |FRESNO, CA 93778-2616
(559) 840-6066 | FAX (559) 488-4195 | TTY 711
www.dot.ca.gov

September 2, 2022

KER-99-32.56
IS/NOP – DEIR
MALIBU VINEYARDS
INDUSTRIAL COMPLEX
GTS #: 17739

SENT VIA EMAIL

Mr. Matthew Hall, Supervising Planner
Kern County Planning & Natural Resources Dept.
2700 'M' Street, Suite 100
Bakersfield, CA 93301

Dear Mr. Hall:

Caltrans has completed review of an Initial Study/Notice of Preparation for a Draft Environmental Impact Report (DEIR) proposing the construction of an industrial complex consisting of approximately 8,786,734 square feet of industrial use space within approximately 24 buildings on approximately 739 acres.

The 739-acre Project site is located on the eastside of State Route (SR) 99, north of Imperial Avenue, approximately 1 mile north of the 7th Standard Road interchange and approximately 2 ½ miles south of the Lerdo Highway interchange. The project site is approximately 1.5 miles west of the SR 65/Burbank Street intersection, north of the City of Bakersfield, Kern County.

The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. Caltrans reviews land use projects and plans through the lenses of our mission and state planning priorities of infill, conservation, and travel-efficient development. Caltrans provides the following comments consistent with the State's smart mobility goals that support a vibrant economy and sustainable communities:

1. The project proposes the extension of Burbank Street, which traverses the middle of the Project site, across SR 99 with a potential new SR 99 interchange at Burbank Street.

2. As a point of information, the location of the proposed future interchange at Burbank Street on the Project site plan does not match the City of Shafter's General

Plan. Furthermore, a new freeway agreement would need to be established for the proposed interchange as the existing Caltrans Freeway Agreement does not include an interchange on SR 99 between Lerdo Highway and 7th Standard Road.

3. Caltrans anticipates that Project generated vehicle trips will utilize the SR 99/7th Standard Road and SR 99/Lerdo Highway interchanges.

4. A Traffic Impact Study (TIS) will be prepared for the Project as part of the DEIR. Caltrans request that a TIS-Scope of Work be developed and be provided to Caltrans for review prior to starting the TIS analysis

5. The most current site plan and a detailed operational statement needs to be included in the TIS-Scope of Work and TIS. The operational statement should include but not limited to: trip generation data based on the Institute of Transportation of Engineers (ITE) land uses, peak hour trip generation, trip distribution, truck percentages, passenger car equivalent factor, hours of operation, types of goods processed, primary function of facility, and number of employees. This information will allow for a better assessment of the generated trips created by this project and the impacts on the safety and operations of the nearby state facilities.

6. Alternative transportation policies should be applied to the development. An assessment of multi-modal facilities should be conducted to develop an integrated multi-modal transportation system to serve and help alleviate traffic congestion caused by the project and related development in this area of the County. The assessment should include the following:

   a. Pedestrian walkways should link this proposal to an internal project area walkway, transit facilities, as well as other walkways in the surrounding area.

   b. The Project might also consider coordinating connections to local and regional bicycle pathways to further encourage the use of bicycles for commuter and recreational purposes.

   c. If transit is not available within ¼-mile of the site, transit should be extended to provide services to what will be a high activity center.

7. Caltrans recommends the Project implement "smart growth" principles regarding parking solutions, providing alternative transportation choices to employees or residents in the vicinity. Alternative transportation choices may include but are not limited to parking for carpools/vanpools, car-share and/or ride-share programs.

8. Active Transportation Plans and Smart Growth efforts support the state's 2050 Climate goals. Caltrans supports reducing Vehicle Miles Traveled (VMT) and Green House Gas (GHG) emissions in ways that increase the likelihood people will use and benefit from a multimodal transportation network.

9. Based on Caltrans VMT-Focused Transportation Impact Study Guide, dated May 20, 2020, and effective as of July 1, 2020, Caltrans seeks to reduce single occupancy vehicle trips, provide a safe transportation system, reduce per capita Vehicle Miles Traveled (VMT), increase accessibility to destinations via cycling, walking, carpooling, transit and reduce greenhouse gas (GHG) emissions. Caltrans recommends that the project proponent continue to work with the County to further implement improvements to reduce vehicles miles traveled and offer a variety of transportation modes for its employees.

10. Caltrans recommends the Project provide charging stations *for electric vehicles and for freight trucking* as part of the statewide efforts to reduce greenhouse gas emissions, reduce freight parking shortages and maintain the Federal Hours of Service regulations.

11. Due to severe truck parking shortages throughout the state and strict Federal Hours of Service regulations that limit the amount of time a truck driver can spend driving per day, many truck drivers cannot find safe and reliable truck parking spaces, and therefore park in unauthorized and/or unsafe areas. Constructing adequate truck parking on-site can alleviate the unauthorized/unsafe truck parking demand on existing facilities. On-site freight parking for trucks will also strive to ensure a secure and reliable area for extended or overnight parking to help maintain adherence to the Federal Hours of Service regulations.

12. Therefore, Caltrans recommends that the Project implement on-site freight parking areas and/or spaces within the Project boundaries, that truck drivers can utilize for extending parking periods before loading or after unloading to alleviate freight parking shortages and maintain the Federal Hours of Service regulations. It is also recommended the County consider promoting the leveraging of strategic investments to maintain and modernize a multimodal freight transportation system with innovative approaches, including advanced technology to optimize integrated network efficiency, improve travel time reliability, and achieve sustainable congestion reduction.

If you have any other questions, please call David Deel, Associate Transportation Planner at (559) 981-1041.

Sincerely,

Lorena Mendibles

Ms. Lorena Mendibles, Branch Chief,
Transportation Planning – South

c: Rob Ball, Deputy Director, Kern Council of Governments
Josh Champlin, Kern County Public Works

Appendix A.3

Scoping Meeting Agenda

This page intentionally left blank.

AGENDA

KERN COUNTY PLANNING & NATURAL RESOURCES DEPARTMENT

Scoping Meeting

Kern County Public Services Building
2700 "M" Street, Conference Room 1A – Public Meeting Room
Bakersfield, California

August 24, 2022 – 1:30 p.m.

Pursuant to revised Section 21083.9 of the Public Resources Code, California Environmental Quality Act, effective January 1, 2002, this scoping meeting is being held to receive agency comments from agencies and the public on the preparation of Environmental Impact Reports (EIR) on certain projects. The process of determining the scope, focus, and content of the EIR is known as "scoping." Scoping helps to identify the range of actions, alternatives, environmental effects, methods of assessment, and mitigation measures to be analyzed in depth, and eliminate from detailed study those issues that are not important to the decision at hand. This is not a public hearing, however the public may be present and offer comments. If you attend as a member of the public to address an item on the agenda, please let the chairperson know, when discussion begins on that item. Each project will be presented by staff followed by an opportunity for comments for the record.

A. INTRODUCTION: Staff, format of meeting

B. NEW CASES:

Malibu Vineyards Project by Malibu Vineyards LP (PP21116)

EIR – Notice of Preparation GPA 9, Map 80; GPA 23, Map 81; ZCC 13, Map 80; ZCC 92, Map 81; PD 2, Map 80; PD 74, Map 81

C. ADJOURNMENT:

AMERICANS WITH DISABILITIES ACT
(Government Code Section 54953.2)

Disabled individuals who need special assistance to attend or participate in the scoping meeting may request assistance at the Kern County Planning Department or by calling Adrenne Lane-Price at (661) 862-8615. Every effort will be made to reasonably accommodate individuals with disabilities by making meeting materials available in alternative formats. Requests for assistance should be made five (5) working days in advance whenever possible.

SUBMIT WRITTEN COMMENTS ON THE NOP BY SEPTEMBER 5, 2022 AT 5:00 PM

Mail to:
Kern County Planning and Natural Resources Department
Attn: Matthew Hall
2700 'M' Street, Suite 100
Bakersfield, CA 93301
Email: hallmat@kerncounty.com

Posted: August 19, 2022
MH

This page intentionally left blank.

Appendix A.4

Scoping Meeting Summary

This page intentionally left blank.

SUMMARY OF PROCEEDINGS

KERN COUNTY AGENCY SCOPING MEETING

Kern County Planning and Natural Resources Department
2700 M Street, Suite 100
Bakersfield, California

Conference Room

Date August 24, 2022

STAFF ATTENDANCE: Katrina Slayton, Division Chief
Matthew Hall, Supervising Planner

The meeting convened at 1:31 p.m. with Ms. Slayton introducing Staff in attendance and Mr. Hall outlining the purpose of the scoping meeting. Items were then discussed in order as identified on the agenda.

NOTICE OF PREPARATION PROJECT:

Malibu Vineyards Project by Malibu Vineyards LP (PP21116)

EIR – Notice of Preparation GPA 9, Map 80; GPA 23, Map 81; ZCC 13, Map 80; ZCC 92, Map 81; PD 2, Map 80; PD 74, Map 81

Mr. Hall introduced and described the proposed project and asked if there were any comments.

Mr. Rob Ball of Kern Council of Governments spoke to mention the "Kern Area Regional Goods-Movement Operations (KARGO)" project addressing traffic impacts to the project area and surroundings, and submitted written comments

Mr. Steve Esselman of the City of Shafter had questions regarding the NOP's statement that the City of Shafter was listed as potentially involved with discretionary permits, required CEQA actions, and stated that he did not believe the project would require any actions by the City. He then submitted written comments.

Mr. Ralph Velador of LiUNA spoke of his interest and support of the project.

Public testimony closed at approximately 1:41 p.m.

Notes prepared by
Matthew Hall, Supervising Planner

This page intentionally left blank.

Appendix A.5

DEIR Comment Letter Summary

This page intentionally left blank.

Comment Summary Table

The Malibu Vineyards Industrial Parkway Project EIR was originally noticed and circulated for public comment. CEQA Guidelines Section 15088.5 (f)(1) provides that when an EIR is revised and the entire EIR is recirculated, the lead agency need not respond to comments received during an earlier circulation period. Therefore, the County will respond only to new comments received regarding this DREIR during the new comment period in the Final REIR. This table serves as a summary of comments received during the circulation of the Draft EIR .

State Regulatory Agencies

California Department of Transportation

Introduction	The comment states their role as Trustee Agency for California Department of Transportation, and submits comments as a Responsible Agency under CEQA, and states their regulatory authority over the State Highway System.	The comment does not raise a substantive issue on the content of the Draft EIR.
Cost Estimate	The comment states agreement with the conclusion of the Traffic Impact Study and requests that the proposed project pay a proportional share for State facilities listed in Table 8. The comment also requests payment into the Regional Transportation Impact Fee (RTIF) program for portions of the proposed project within the RTIF boundary using the current fee schedule. Additionally, the comment recommends preparing cost estimates for the mitigations listed in Table 8 and coordinating with the County on the development and funding of the additional freeway interchange(s) on State Route 99 near Burbank Street. Caltrans requests these as conditions of approval of the DEIR.	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 4.16, *Transportation and Traffic.*
Fair share fees	The comment highlights an error in the fair share formula presented on page 36 of the Draft EIR and requests a cost estimate for the recommended mitigation to ensure that the calculation accurately reflects the fair share.	This Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 4.16, *Transportation and Traffic*

Multimodal Transportation Policies	The comment states that alternative transportation policies should be applied and recommends an assessment of multi-modal facilities to best integrate multi-modal transportation systems to alleviate traffic congestion caused by the project and related development in this area of the County. The comment suggests that the assessment includes the following: a. Pedestrian walkways with internal linkages and connections to transit facilities b. Coordination of local and regional bicycle network to encourage commuter and recreational bicycle use c. Consideration of transit extensions if transit is not available within ¼-mile of the site	This Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 4.6, *Energy,* and Section4.16, *Transportation and Traffic.*
"Smart Growth" Principles	The comment recommends the proposed project implement "smart growth" principles regarding parking solutions and provide alternative transportation choices to employees in the vicinity, including parking for carpools/vanpools, car-share and/or ride-share programs.	This Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 4.6, *Energy,* and Section 4.16, *Transportation and Traffic.*
2050 Climate goals	The comment states their support for reducing Vehicle Miles Traveled (VMT) and Green House Gas (GHG) emissions in ways that increase the likelihood that people will use and benefit from a multimodal transportation network.	This Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 4.16, *Transportation and Traffic.*
VMT	The comment recommends the proposed project continue to work with the County to implement improvements that offer a variety of transportation modes for its employees to reduce vehicles miles traveled.	This Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 4.6, *Energy,* and 4.16, *Transportation and Traffic.*
Electric Charging Stations	The comment recommends the proposed project include charging stations for electric vehicles and for freight trucks to reduce greenhouse gas emissions, freight parking shortages, and to maintain the Federal Hours of Service regulations.	This Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 4.6, *Energy,* and Section 4.16, *Transportation and Traffic.*
Freight Parking	The comment discusses the combination of truck parking shortages throughout the state and strict Federal Hours of Service regulations that contribute to the lack of safe and reliable truck parking spaces. The comment states that constructing adequate truck parking on-site can alleviate the unauthorized/unsafe truck parking demand on existing facilities and ensure a secure and reliable area for extended or overnight parking to maintain adherence to the Federal Hours of Service regulations.	This Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 4.16, *Transportation and Traffic.*
Freight Parking	The comment recommends the proposed project implement on-site freight parking areas and/or spaces within the project boundaries to alleviate freight parking shortages and maintain the Federal Hours of Service regulations. The comment also recommends leveraging strategic investments to maintain and modernize a multimodal freight transportation system with innovative approaches, including advanced technology to optimize integrated network efficiency, improve travel time reliability, and achieve sustainable congestion reduction.	This Draft DREIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See RDEIR Section 4.16, *Transportation and Traffic.*

California Department of Fish and Wildlife		
Introduction	The comment states their role as Trustee Agency for fish and wildlife resources, and submits comments as a Responsible Agency under CEQA, and states their regulatory authority as provided by the Fish and Game Code.	The comment does not raise a substantive issue on the content of the Draft EIR.
Special-status Species - Mitigation measures	The comment expresses concern about the ability of some of the proposed mitigation measures to reduce impacts to less than significant and avoid the unauthorized take for several special-status animal species including San Joaquin kit fox, Swainson's hawk, and burrowing owl.	This Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See RDEIR Section 4.4, *Biological Resources.*
San Joaquin Kit Fox	The comment states that if pre-construction survey determines that special-status wildlife species are present, the project proponent shall confer with the U.S. Fish and Wildlife Service or California Department of Fish and Wildlife, as required by applicable law, for proper avoidance measures or the need for take authorization through the acquisition of an incidental take permit, pursuant to Fish and Game Code section 2081 subdivision (d). Additionally, the comment recommends that surveys be conducted prior to the issuance of any grading or building permits or the start of ground disturbance and the following: • **Recommended Mitigation Measure 1**: SJKF Avoidance Buffer CDFW recommends implementing no-disturbance buffers, as described in the USFWS' "Standardized Recommendations for Protection of the San Joaquin Kit Fox Prior to or During Ground Disturbance" (2011) (USFWS Protocol) around potentially suitable or known SJKF den sites. • **Recommended Mitigation Measure 2:** SJKF Take Authorization If the no-disturbance buffers outlined in the USFWS Protocol for SJKF is not feasible, CDFW recommends that consultation with CDFW occur to discuss how to implement the proposed project and avoid take. If take cannot be avoided, CDFW recommends the project proponent pursue take authorization through the acquisition of an Incidental Take Permit (ITP), pursuant to Fish and Game Code section 2081 subdivision (b) to comply with CESA.	This Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See RDEIR Section 4.4, *Biological Resources.*

Swainson's Hawk	The comment concurs with conducting surveys for SWHA and recommends that SWHA protocol-level surveys be conducted consistent with the survey methods developed by Swainson's Hawk Technical Advisory Committee (SWHA TAC 2000) prior to the issuance of any grading or building permits or the start of ground disturbance. In addition, the comment recommends the following mitigation measures: • **Recommended Mitigation Measure 3:** SWHA Avoidance Buffer if project-specific activities will take place during the SWHA nesting season (i.e., March 1 through September 15), and active SWHA nests are present, CDFW recommends a minimum ½-mile no-disturbance buffer be delineated and maintained around each nest, regardless of whether it was detected by surveys or observed incidentally. These buffers should remain in place until the breeding season ends or until a qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or parental care for survival, to prevent nest abandonment and other take of SWHA as a result of project activities. • **Recommended Mitigation Measure 4:** SWHA Take Authorization CDFW also recommends that in the event an active SWHA nest is detected, and a ½-mile no-disturbance buffer is not feasible, consultation with CDFW is warranted to discuss how to implement the proposed project and avoid take. If take cannot be avoided, CDFW recommends pursuing an ITP pursuant to Fish and Game Code section 2081 subdivision (b) to prevent inadvertent take of the species in advance of any project construction.	This Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 4.4, *Biological Resources.*
Burrowing Owl	The comment states their concurrence with conducting BUOW surveys and recommends that BUOW protocol-level surveys be conducted by a qualified biologist following CDFW's "Staff Report on Burrowing Owl Mitigation" (CDFG 2012) prior to the issuance of any grading or building permits or the start of ground disturbance. The comment also recommends the following mitigation measures: • **Recommended Mitigation Measure 5:** BUOW Avoidance Buffer Should a BUOW be detected, CDFW recommends that no-disturbance buffers, as outlined in the "Staff Report on Burrowing Owl Mitigation" (CDFG 2012), be implemented prior to and during any ground-disturbing activities. Specifically, CDFW's Staff Report recommends that impacts to occupied burrows be avoided in accordance with the following table unless a qualified biologist approved by CDFW verifies through non-invasive methods that either: 1) the birds have not begun egg laying and incubation; or 2) that juveniles from the occupied burrows are foraging independently and are capable of independent survival. • **Recommended Mitigation Measure 6:** BUOW Consultation If BUOW are found within these recommended buffers and avoidance is not possible, consultation with the CDFW is recommended for guidance on the development of mitigation measures such as take avoidance, minimization, and mitigation.	This Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 4.4, *Biological Resources.*

Agency Coordination	The comment advises consultation with USFWS to comply with the Federal Endangered Species Act (FESA) in advance of any project activities as potential impacts to federally listed species or accidental take under the FESA is more broadly defined than CESA. Additionally, the comment states that if the CEQA document approved for the proposed project does not adequately describe the proposed project and its impacts on lakes or streams, a subsequent CEQA analysis may be necessary for LSAA issuance. The comment provides the following link for information on notification requirements, (https://wildlife.ca.gov/Conservation/LSA) and the following telephone number (559) 243-4593 to contact the CDFW staff in the Central Region Lake and Streambed Alteration Program.	This Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 4.4, *Biological Resources.*
Environmental Data	The comment requests the proposed project to report any special-status species and natural communities detected during project surveys to the CNDDB. The comment provides the CNDDB field survey at the following link: https://www.wildlife.ca.gov/Data/CNDDB/Submitting-Data and states that the completed form can be mailed electronically to CNDDB at the following email address: CNDDB@wildlife.ca.gov.	The comment does not raise a substantive issue on the content of the Draft EIR.
Filing Fees	The comment states that the proposed project would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. The comment states that fees are payable upon filing of the Notice of Determination by the Lead Agency and is required for the underlying project approval to be operative, vested, and final (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089).	The comment does not raise a substantive issue on the content of the Draft EIR.
Conclusion	The comment states that more information on surveys and monitoring protocols for sensitive species can be found at CDFW's website (https://www.wildlife.ca.gov/Conservation/Survey-Protocols).	The comment does not raise a substantive issue on the content of the Draft EIR.

California Air Resources Board		
Air Quality Impacts – Public Health	The comment expresses concern regarding the proposed project's potential to expose nearby residential communities, particularly disadvantaged communities, to greater levels of air pollution.	This Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 4.3, *Air Quality.*
Air Quality Impacts – Transport Refrigeration Units	The comment states that the proposed project did not model and report air pollutant emissions from Transport Refrigeration Units in the Draft EIR as the current version of CALEEMOD does not account for TRUs, which was used in the report. The comment recommends the proposed project use CARB's latest emission factors and assumes a percentage of truck fleet equipped with TRUs and estimate idling duration for each TRU.	This Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. The Air Quality Impact Analysis was revised and included in the DREIR. See RDEIR Section 4.3, *Air Quality,* and Appendix D, *Air Quality Impact Analysis.*
Air Quality Impacts – Trip Lengths	The comment states that the proposed project's mobile source air pollutant emissions were underestimated due to miscalculated truck trip lengths and input errors in the CalEEMod for Phase 2. The comment recommends the EIR be revised to reflect the corrected 50- mile trip distance.	This Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. The Air Quality Impact Analysis was revised and included in the DREIR. See RDEIR Section 4.3, *Air Quality,* and Appendix D, *Air Quality Impact Analysis.*
Air Quality Impacts - Grading Emissions	The comment states the proposed project did not model heavy-duty truck trips associated with the import and export of soil during construction grading, based on the CalEEMod input files provided in Appendix D.	This Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. The Air Quality Impact Analysis was revised and included in the DREIR. See RDEIR Section 4.3, *Air Quality,* and Appendix D, *Air Quality Impact Analysis.*
Air Quality Impacts- Health Risk Analysis (HRA)	The comment states that the HRA prepared for the proposed project was inadequate and that the proposed project assumed an idling duration of 15 minutes for onsite heavy-duty trucks when evaluating the proposed project's health risk impacts. The CARB's Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling (ATCM) restricts trucks from idling longer than five minutes, except for trucks equipped with a diesel engine that meet optional Nox idling emissions standard and when operating outside of 100' of a restricted area such as residences and schools. The comment also notes that many 2008 and newer model trucks are clean-idle certified, and may therefore be exempt from the ATCM limit, allowing them to idle for more than 5 minutes a day. Therefore, the comment recommends a full evaluation of the proposed project's potential health risk impacts. To do this, the comment requests the proposed project to either add a project design feature in the DEIR restricting heavy-duty truck idling within the project site to less than 15 minutes or revise the proposed project's HRA to assume a heavy-duty truck idling duration supported by substantial evidence. Additionally, the comment states that the assumed HRA percentage of trucks and trailers with TRUs idling within the project site is inconsistent with the proposed project's description. The comment recommends the proposed project assume 25% of trucks and trailers serving the project site to contain TRUs, or to provide substantial evidence supporting the 5% assumption. Furthermore, the comment states the cancer risks from TRUs is unclear, as the HRA does not provide associated idling time, exhaust emissions factors, or number of trips along local roadways, and requests the HRA show a figure with truck routes used to model the proposed project's health risk impacts.	This Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. The Air Quality Impact Analysis was revised and included in the DREIR. See RDEIR Section 4.3, *Air Quality,* and Appendix D, *Air Quality Impact Analysis.*

Air Quality Impacts–Mitigation Measures	The comment expresses concern that the mitigation measures included in Section 4.3 (Air Quality) of the Draft EIR would reduce impacts to air quality to less than significant levels and recommend additional design and mitigation measures provided below: • **MM 4.3-3** would require all equipment used during the construction of the proposed project to be powered by Tier 4 engines, when available, rather than the stated Tier 3 engines and to reduce the idling time for all heavy-duty trucks and off-road equipment to five minutes. • **MM 4.3-4** would require Owners/Operators of industrial buildings within the project site to enter into a DMA with the SJVAPCD and pay fees to avoid any net increase in the emissions of NOx, ROG, PM10, and particulate matter less than 2.5 micrometers (PM2.5) as currently required in MM 4.3-4, to fully mitigate the proposed project's air quality and health risk impacts, a project design feature or mitigation measure in the Final EIR is recommended that would require all heavy-duty trucks serving the proposed project during its operation to be zero-emission. As presented in the comment, there are many regulations that promote and eventually require the use of zero-emission trucks at freight facilities, such as the proposed project. Specifically, the Advanced Clean Fleet Regulation would require all drayage trucks in California to be zero-emission by 2035. To support trucks serving the proposed project, that are already complying with the Advanced Clean Fleets regulation, CARB recommends the infrastructure to support on-site zero-emission trucks at the start of project operations.	This Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 4.3, *Air Quality*.
California Department of Conservation		
Plugged or Abandoned Wells	The comment states that there are no known oil or gas wells within the project boundary.	The comment does not raise a substantive issue on the content of the Draft EIR.
CalGem Division Authority	The comment lists their statutory authority over well drilling, operation, maintenance, and abandonment to prevent damage to health, property, and natural resources. Additionally, the comment states if any wells are encountered that were not part of this review during development activities, the property owner is expected to immediately notify the Division's construction site well review engineer in the Inland district office, and file for Division review an amended site plan with well casing diagrams. The comment notes that the District office will then send a follow-up well evaluated letter to the property owner and local permitting agency.	This Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 4.9, *Hazards and Hazardous Materials*.

Local Regulatory Agencies		
Kern County Superintendent of Schools		
Public Services-Schools	The comment states that the proposed project may have significant effects on district facilities and mitigation of the proposed project's impacts on public school facilities would be limited to the collection of statutory fees authorized under Education Code Section 17620 and Government Code Sections 65995et seq. at the time that building permits are issued.	The proposed project is required to submit all statutory fees. The comment does not raise a substantive issue on the content of the Draft EIR.
Kern County Public Works Department – Floodplain Management Division		
Public Works - Development	The Development Review Division states they have reviewed the proposed project and has no comment.	The comment does not raise a substantive issue on the content of the Draft EIR.
Public Works - Floodplain Management	The comment states the runoff of storm water from the site would increase due to the impervious surface generated by the proposed development and therefore, the comment recommends the applicant provide a plan for the disposal of drainage waters originating on site and from adjacent road rights-of-way (if required), subject to approval of the Public Works Department, per the Kern County Development Standards.	This Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5See DREIR Section 4.10*, Hydrology and Water Quality*.
Public Works - Sewer and Water Division	The comment states that a Will-Serve Letter from the sewer district shall be provided for the County staff and the sewer must be connected to a regional wastewater treatment plant.	This Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 4.14, *Public Services.*
Public Works - CSA	The comment states the CSA Division has reviewed the proposed project and has no comment.	The comment does not raise a substantive issue on the content of the Draft EIR.

Kern County Public Works Department – Building & Development/Survey Division		
Land Use and Planning – Conditional Use	The comment recommends the following be placed on a Conditional Use Permit: • Prior to issuance of a building or grading permit, all survey monuments should be tied out by a Licensed Land Surveyor with a corner record for each monument of survey submitted to the County Surveyor subject to Section 8771 of the Professional Land Surveyor's (PLS) Act. • Prior to final inspection, all survey monuments that were destroyed during construction shall be re-set or have a suitable witness corner set with a post construction corner record for each monument re-set or a record of survey submitted to the County Surveyor for processing. • Upon completion of the proposed project, all survey monuments shall be accessible by a Licensed Land Surveyor or their representatives, with prior notice.	This Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 4.11, *Land Use and Planning*.
San Joaquin Valley Air Pollution Control District		
Air Quality – Heavy-Duty Truck Trips	The comment states that the proposed project's mobile source air pollutant emissions are underestimated as the truck trip lengths, and the CalEEMod trip distance for heavy-duty trucks under Phases 1 and 2 input is errored. The comment recommends the emissions analysis be revised to correct this omission.	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. The Air Quality Impact Analysis was revised and included in the DREIR. See DREIR Section 4.3, *Air Quality*, and Appendix D, *Air Quality Impact Analysis*.
Air Quality - Emissions	The comment recommends several emission reduction strategies to improve air quality, including using the cleanest heavy-duty trucks and off-road equipment available, minimizing truck idling (3-minute idling restriction), and routing trucks away from residential areas and providing solid screen buffering trees, solid decorative walls, and other natural ground landscaping techniques along the property line of adjacent sensitive receptors. Other measures involve siting requirements for loading docks, placing loading docks at least 300 feet from sensitive areas unless used exclusively for electric trucks, and clearly marking on-site circulation patterns to reduce unnecessary vehicle travel. Additional strategies include requiring solar-ready roofs, installing rooftop solar panels to power non-refrigerated operations, and providing electric plug-in capacity for refrigerated trucks to prevent idling emissions.	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 4.3, *Air Quality*, as well as Section 4.1, *Aesthetics*.

Air Quality – Zero-Emission HHD Fleets and Electric Infrastructure	The comment recommends the proposed project uses the cleanest available HHD fleet and on-site service equipment, including zero and near-zero technologies. Additionally, the comment states that the Draft EIR should discuss the use of zero and near-zero emissions technologies as mitigation measures for the propose project and recommends the following mitigation measures to be added to the Draft EIR to reduce impacts from operational mobile source emissions: • **Recommended Measure:** Fleets associated with operational activities utilize the cleanest available HHD trucks, including zero and near-zero technologies. • **Recommended Measure:** All on-site service equipment (cargo handling, yard hostlers, forklifts, pallet jacks, etc.) utilize zero-emissions technologies.	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 4.3, *Air Quality*, as well as Section 4.6, Energy, and Section 4.8, *Greenhouse Gases*.
Air Quality – Truck Routing	The comment recommends that the Draft EIR includes requirements for the project proponent to assess HHD truck routing patterns for the proposed project, with the aim of limiting exposure of residential communities and sensitive receptors to emissions. Furthermore, the comment states that the truck routing evaluation should also identify alternative truck routes, VMT, and air quality.	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See RDEIR Section 4.3, *Air Quality*, and Section 4.16, *Transportation and Traffic*.
Air Quality – Idling Time	The comment states that to limit significant adverse health and environmental impacts from localized PM2.5 and toxic air contaminants associated with idling of Heavy -Duty trucks, the proposed project should include measures to ensure compliance with state anti-idling regulation, especially near sensitive receptors. The comment recommends a more stringent 3-minute idling restriction time with appropriate signage and enforcement.	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 4.3, *Air Quality*.
Air Quality – Zero Emissions	The comment recommends requirements for the project proponents to utilize electric or zero emission off-road and on-road equipment.	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 4.3, *Air Quality* as well as Section 4.6, Energy, and Section 4.8, *Greenhouse Gases*.
Air Quality – Electric Infrastructure	The comment recommends that the proposed project require all nonresidential buildings be designed with electric infrastructure to support the use of on-road zero emissions vehicles, such as HHD trucks associated with warehouses and distribution buildings, and electric vehicle chargers at project sites, and at strategic locations.	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 4.3, *Air Quality* as well as Section 4.6, *Energy, and Section* 4.8, *Greenhouse Gases*.
Air Quality – Health Risk Screening/Assessment and Ambient Air Quality Analysis	The comment lists deficiencies with the HRA and AAQA, specifically on dispersion modeling, idling emissions included in HRA analysis, and offsite truck travel emissions for truck travel within a ¼ mile of the site.	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. The Air Quality Impact Analysis was revised and included in the DREIR. See RDEIR Section 4.3, *Air Quality* and Appendix D, *Air Quality Impact Analysis*.
Air Quality – Sensitive Receptors	The comment recommends incorporating vegetative barriers and urban greening to further reduce air pollution exposure to sensitive receptors.	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 4.3, *Air Quality*, as well as Section 4.1, *Aesthetics*.

Air Quality-Solar/Emissions	The comment suggests that the County consider incorporating solar power systems as an emission reduction strategy for the proposed project.	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 4.3, Air Quality, as well as Section 4.6, *Energy*, and Section 4.8, *Greenhouse Gases*.
Air Quality – Rules and Regulations	The comment states that the proposed project is subject to District rules and regulations to reduce its impacts on air quality and that current District rules can be found online at: https://ww2.valleyair.org/rules-and-planning/current-district-rules-and-regulations. The comment also encourages the project proponents to contact the District's Small Business Assistance (SBA) Office at (661) 392-5665.	This comment provides general regulatory information and does not raise a specific environmental issue under CEQA. See DREIR Section 4.3, *Air Quality*.
Air Quality – Permitting	The comment states that the proposed project may be subject to District Rule 2010 (Permits Required) and Rule 2201 (New and Modified Stationary Source Review) and may require District permits. The comment recommends that an application for an ATC is submitted prior to construction.	This comment provides general regulatory information and does not raise a specific environmental issue under CEQA. The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section See RDEIR Section 4.3, *Air Quality*.
Air Quality - District Rule 9510	The comment states that the proposed project is subject to District Rule 9510 because it would receive project-level discretionary approval from a public agency and equal or exceed 25,000 square feet of light industrial. Additionally, the comment states that the proposed project has not submitted an AIA application and that an AIA application is required to be submitted to the District to comply with District Rule 9510 so that proper mitigation and clean air design under ISR can be incorporated into the proposed project's design.	This comment provides general regulatory information and does not raise a specific environmental issue under CEQA. The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 4.3, *Air Quality*.
Air Quality - District Rule 9410	The comment states that the proposed project may be subject to District Rule 9410 (Employer Based Trip Reduction) if the proposed project would result in employment of 100 or more "eligible" employees. The comment states that the District Rule 9410 requires employers with 100 or more "eligible" employees at a worksite to establish an Employer Trip Reduction Implementation Plan (eTRIP) that encourages employees to reduce single-occupancy vehicle trips, thus reducing pollutant emissions associated with work commutes.	This comment provides general regulatory information and does not raise a specific environmental issue under CEQA. The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 4.3, *Air Quality*.
Air Quality - District Rule 4002	The comment states the proposed project may be subject to District Rule 4002 which would require a thorough inspection for asbestos to be conducted before any regulated facility is demolished or renovated.	This comment provides general regulatory information and does not raise a specific environmental issue under CEQA. The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 4.3, *Air Quality*.
Air Quality - District Rule 4601	The comment states that the proposed project would be subject to District Rule 4601 since it is expected to utilize architectural coatings. Architectural coatings are paints, varnishes, sealers, or stains that are applied to structures, portable buildings, pavements or curbs. The purpose of this rule is to limit VOC emissions from architectural coatings.	This comment provides general regulatory information and does not raise a specific environmental issue under CEQA. The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 4.3*, Air Quality*.

Air Quality – District Rule 8021	The comment states that a Construction Notification Form or approval of a Dust Control Plan may be required prior to commencing any earthmoving activities and if the proposed project results in at least 1-acre in size, a written notification to the District at least 48 hours prior to any earthmoving activities pursuant to District Rule 8021- Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities. Additionally, the comment states that if the proposed project results in the disturbance of 5-acres or more, or includes moving, depositing, or relocating more than 2,500 cubic yards per day of bulk materials, the project proponent shall submit to the District a Dust Control Plan pursuant to District Rule 8021 (Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities	This comment provides general regulatory information and does not raise a specific environmental issue under CEQA. The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 4.3, *Air Quality*.
Air Quality - District Rules and Regulations	The comment states that the proposed project may also be subject to the following District rules: Rule 4102 (Nuisance) and Rule 4641 (Cutback, Slow Cure, and Emulsified Asphalt, Paving and Maintenance Operations).	This comment provides general regulatory information and does not raise a specific environmental issue under CEQA. The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 4.3, *Air Quality*.
Conclusion	The comment recommends that a copy of the district's comments be provided to the project proponent.	The comment does not raise a substantive issue on the content of the Draft EIR.

Interested Parties

Advocates for the Environment

Net Zero Requirements	The comment states that a net-zero significance threshold is feasible and supportable and suggests that constructing new buildings to be net-zero is more affordable than retrofitting older buildings to comply with climate change regulations. The comment suggests the proposed project to adopt net-zero as the GHG significance threshold to support the reduction of GHG emissions in California, particularly the CARB 2022 Scoping Plan. The comment notes that moving forward with as a net-zero project would help protect the County and the Applicant from CEQA GHG litigation.	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 4.8, *Greenhouse Gas Emissions.*
Mitigation Measure – Feasible Mitigation of GHG	The comment states that Draft EIR did not provide evidence that there was no further feasible mitigation, and did not provide rationale why, existing regulations and the adopted mitigation measures would be the only feasible mitigation for this proposed project. The comment also notes that despite the availability of other GHG mitigation measures, the Draft EIR declared that the proposed project's mitigated emissions were unavoidable and therefore should have included more mitigation to reduce the proposed project's GHG emissions to the extent required by CEQA.	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 4.8, *Greenhouse Gas Emissions.*

Mitigation Measure – GHG 4.8-1	The comment states that MM-GHG 4.8-1 describes elements of plans to be later prepared and adopted in the future, rather than specific, measurable mitigation standards to be decided as part of the CEQA information-sharing process before the project approval. Therefore, the comment claims that the proposed project's lack of specific performance standards for future mitigation measures in the DEIR constitutes an improper deferral, violating CEQA.	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 4.8, *Greenhouse Gas Emissions.*
Justification and Supported Evidence	The comment suggests that Draft EIR should have proposed more mitigation measures to justify the conclusion that the proposed project's GHG impact would be unavoidable due to lack of feasibility of further mitigation. The comment states that the proposed project did not represent the maximum feasible mitigation to support a finding that the proposed project's impact would be significant and unavoidable. The comment makes recommendations to reduce impacts, including provisions that would limit the use of heavy-duty diesel trucks or the requirement of non-diesel fuels, in a tenant agreement. Another recommendation is for the requirement that the future tenants use hybrid or zero-emission commercial vehicles with charging systems powered by solar panels.	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 4.8, *Greenhouse Gas Emissions.*
Mitigation Measure – GHG emissions overall	The comment states that the Draft EIR claim that no other mitigation measures are feasible, beyond the identified mitigation measures is incorrect, and not supported by substantial evidence. The comment recommends that the proposed project commit to low-warming HFCs or other alternatives to traditional coolants, as well as energy-efficient refrigeration systems, solar panel installation or incorporating renewable energy production on-site. Additionally, the comment notes that having solar panels capable of offsetting 100% of the buildings' energy demands would enhance the effectiveness and decrease GHG emissions overall.	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 4.8, *Greenhouse Gas Emissions.*
Conclusion	The comment states that Draft EIR fails to require all feasible mitigation, despite concluding that the significant GHG impact will be unavoidable. The comment notes that the proposed project has not substantiated why such measures are infeasible, and therefore the Draft EIR should be amended to reflect all feasible mitigation to the fair-share extent. Additionally, the comment requests that Advocates for the Environment is included in future interest lists to receive updates about the progress of the proposed project.	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 4.8, Greenhouse Gas Emissions.

The Center on Race, Poverty & the Environment		
Introduction	The comment asks for additional time and opportunities for the public to understand the proposed project's environmental analyses and provide input that can then be incorporated into the Final Environmental Impact Report	As specified in CEQA Guidelines §15105(a), "the public review period for a draft EIR should not be less than 30 days nor longer than 60 days except in unusual circumstances. When a draft EIR is submitted to the State Clearinghouse for review by State agencies, the public review period shall not be less than 45 days." Section 15087(e) of the State CEQA Guidelines further specifies that "the public review period shall be at least as long as the review period established by the Clearinghouse." Circulation of the Malibu Vineyards Industrial Parkway Project began on July 15, 2024, and ended on August 29, 2024, for the required 45-day public review and comment period. However, while the comment period may close for purposes of meeting the above-listed CEQA Guidelines, it is a policy of the Kern County Planning and Natural Resources Department to accept all comments on the Draft EIR and the proposed project throughout the entire application process. The proposed project will be noticed and considered by the Kern County Planning Commission , and then will be considered at a noticed public hearing before the Board of Supervisors. All comments received will be included in the administrative record for consideration by the decision makers and written replies will be provided through the Final EIR – Response to Comments, staff reports, and presentations at the hearings. The comment does not raise a substantive issue on the content of the Draft EIR.
Extended public comment period	The comment states that the 45-day public comment period should be extended to 90 days to allow the public, particularly those without technical expertise, to review the analysis, ask questions, and provide decision-makers with input.	
Public hearing	The comment states that public hearings should provide two-way, simultaneous Spanish and English interpretation for oral presentations and public comments.	The comment does not raise a substantive issue on the content of the Draft EIR.
Spanish translation	The comment states that the Draft EIR did not provide a Spanish translation and therefore limited many community members from participating in CEQA. The comment recommends that a copy of the Draft EIR is available in Spanish and any other commonly spoken language.	The Draft EIR meets all the legal requirements of CEQA, including for notification. As validated by the 5th District Court of Appeals on two occasions, translation of any portion of the Draft EIR is not required by law. The Draft EIR was posted online, and online translation software can be used at the discretion of the reader for access. The comment does not raise a substantive issue on the content of the Draft EIR.
Community Members and Stakeholders	The comment states that interested community groups and stakeholders should be provided with the opportunity to discuss concerns, ask questions, and receive direct responses, as well as provide relevant input to decision-makers. The comment states that any input received in meetings should become part of the administrative record for the proposed project	The Draft EIR adequately describes the proposed project, and the proposed project requires two (2) public hearings with opportunities for the public to comment; the Planning Commission and Board of Supervisors hearings. The comment does not raise a substantive issue on the content of the Draft EIR.

Postpone the Kern County Planning Commission Hearing	The comment states that the Planning Commission hearing should be postponed and the public comment period should be extended to 90 days. Additionally, the comment states that the extended timeline would allow input received from the public to be incorporated into the Final EIR.	The comment does not raise a substantive issue on the content of the Draft EIR.
SoCalGas – Transmission Department		
Coordination	The comment states that SoCalGas does not currently operate any facilities within the proposed improvement. However, the comment states that SoCalGas may maintain and operate facilities within the project scope and asks the project proponent to email the distribution pipeline system to confirm.	The comment does not raise a substantive issue on the content of the Draft EIR.
Supporters Alliance for Environmental Responsibility (SAFER)		
Mitigation Measures - General	The comment requests that Draft EIR be revised to incorporate additional mitigation measures that reduce the proposed project's impact and requests a revised draft and recirculation of the document prior to considering project approval.	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 2.4, Introduction.
Golden State Environmental Justice Alliance		
Introduction	The comment provides introductory remarks and summarizes the proposed project.	The comment does not raise a substantive issue on the content of the Draft EIR.
Project Description	The comment recommends the Draft EIR is revised to include a floor plan, grading plan, building elevations, and project narrative for public review.	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Chapter 3, *Project Description.*
Air Quality, Energy, and Greenhouse Gas Emissions	The comment states that the Draft EIR does not include meaningful analysis regarding project census tract and health impacts from pollution, which is important because the community is highly burdened by pollution and ranked in the 88th percentile for overall pollution burden. The comment states that the tract is ranked in the 88th percentile for ozone burden and 98th percale for particulate matter 2.5, which are attributed to heavy car and truck activity. The comment provides other percentiles for water quality, solid waste facility impacts, and race and ethnicity, and further identifies SB 535 Disadvantaged Communities. Overall, the comment states that the Draft EIR did not consider the negative environmental, health, and quality of life impacts and states that the EIR used CalEEMod to model for energy impacts, which is not an approved software for non-residential buildings compliant with Title 24.	The EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 4.3, *Air Quality* and Section 4.8, *Greenhouse Gas Emissions*.

Hazards and Hazardous Materials - Aviation	The comment states that the proposed project has not been reviewed by the Kern County Board of Supervisors for compatibility with the Airport Land Use Compatibility Plan and therefore does not comply with PUC Section 21676(b). The comment suggests that because the proposed project does not comply with PUC Section 21676(b), the Draft EIR has not provided evidence to conclude the proposed project will not result in a safety hazard or excessive noise for people residing or working in the project area, and therefore, should be revised to include a finding of significance.	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Chapter 4.9, *Hazards and Hazardous Materials.*
Land Use and Planning - General Plan	The comment states that the Draft EIR should be revised to include a consistency analysis that considers the proposed project's significant and unavoidable impacts in its analysis, including but not limited to the following goals and policies that were adopted for the purpose of avoiding or mitigating an environmental effect: • **Land Use Element Policy 1:** Provide for the following types of land uses, as depicted on the Land Use Plan (I-1). • **Land Use Element Policy 91:** Encourage employers and developers of employee-intensive commercial and industrial projects to provide facilities or referral services for the childcare needs of employees (I-14). • **Circulation Element Goal 3:** Minimize the impact of truck traffic on circulation and on noise-sensitive land uses. • **Circulation Element Goal 4:** Provide a street system that creates a positive image of Bakersfield and contributes to residents' quality of life. • **Circulation Element Goal 5:** Provide a system of freeways which maintains adequate travel times in and around the metropolitan area. • **Circulation Element Goal 6:** Provide a local street network that contributes to the quality and safety of residential neighborhoods and commercial districts. • **Circulation Element Goal 7:** Develop and maintain a circulation system that supports the land use plan shown in the general plan. • **Circulation Element Policy 16:** Require that truck access to commercial and industrial properties be designed to minimize impacts on adjacent residential parcels (I-14). • **Circulation Element Policy 34:** Minimize the impacts of land use development on the circulation system. Review all development plans, rezoning applications, proposed general plan amendments with respect to their impact on the transportation system, and require revisions as necessary (I-26).	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Chapter 4.2, *Agriculture and Forestry Resources,* 4.3, *Air Quality*, Section 4.11, *Land Use and Planning,* Section 4.16, *Transportation and Traffic.*

	• **Conservation Element Goal 2 (Soils and Agriculture):** Promote soil conservation and minimize development of prime agricultural land as defined by the following criteria: capability Class I and/or II irrigated soils, 80-100 Storie Index rating, gross crop return of $200 or more per acre per year, annual carrying capacity of 1 animal unit per acre per year. • **Conservation Element Policy 3 (Soils and Agriculture):** Protect areas designated for agricultural use, which include Class I and II agricultural soils having surface delivery water systems, from the encroachment of residential and commercial subdivision development activities (I-2). • **Conservation Element Policy 9 (Soils and Agriculture):** Protect prime agricultural lands against unplanned urban development by adopting agricultural zoning, agricultural land use designations, and by encouraging use of the Williamson Act and the Farmland Security Zone Program and policies that provide tax and economic incentives to ensure the long-term retention of agricultural lands (I-5). • **Conservation Element Policy 17 (Soils and Agriculture):** Sensitive subdivision design of lands near or adjacent to agricultural areas shall be conducted with consideration given to the impacts of nonagricultural uses on agricultural uses. • **Conservation Element Policy 18 (Soils and Agriculture):** To reduce the potential for conflicts between agricultural and nonagricultural uses, sensitive subdivision design of lands near or adjacent to agricultural areas shall be conducted including provisions for buffer zones (i.e., road, canal, wall, easement, or setback).	
Land Use and Planning - Metropolitan Bakersfield General Plan (MBGP)	The comment states that the Draft EIR does not provide an analysis of the proposed project's consistency or inconsistency with the Metropolitan Bakersfield General Plan (MBGP). Therefore, the comment suggests that the EIR be revised to include a consistency analysis of the proposed project's significant and unavoidable impacts, including but not limited to the following goals and policies: • **MBGP Land Use Element Goal 7:** Establish a built environment which achieves a compatible functional and visual relationship among individual buildings and sites. • **MBGP Land Use Element Goal 8:** Target growth companies that meet clean air requirements and create sustainable employment in jobs paying higher wages.	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Chapter 4.2, *Agriculture and Forestry Resources,* 4.3, *Air Quality*, Section 4.11, *Land Use and Planning,* Section 4.16, *Transportation and Traffic.*

	• **MBGP Land Use Element Policy 80:** Assure that General Plan Amendment proposals for the conversion of designated agricultural lands to urban development occur in an orderly and logical manner considering the effect on existing agricultural areas (see Chapter V, Conservation/Soils and Agriculture Policies 3 and 14) (I-15) • **MBGP Circulation Element Policy 20:** Prohibit parking on new arterials in incorporated areas. In unincorporated areas, prohibit parking when traffic studies warrant elimination. Allow parking on collectors and on residential streets (I-17). • **MBGP Conservation Element Policy 2 (Soils and Agriculture):** Review projects that propose subdividing or urbanizing prime agricultural land to ascertain how continued commercial agricultural production in the project vicinity will be affected (I-2). • **MBGP Conservation Element Goal 1 (Air Quality):** Promote air quality that is compatible with health, well being, and enjoyment of life by controlling point sources and minimizing vehicular trips to reduce air pollutants. • **MBGP Conservation Element Policy 2 (Air Quality):** Encourage land uses and land use practices which do not contribute significantly to air quality degradation. • **MBGP Conservation Element Goal 3 (Air Quality):** Reduce the amount of vehicular emissions in the planning area. • **MBGP Conservation Element Policy 4 (Air Quality):** Consider air pollution impacts when evaluating discretionary land use proposals. Considerations should include a) Alternative access routes to reduce traffic congestion; b) Development phasing to match road capacities; c) Buffers including increase vegetation to increase emission dispersion and reduce impacts of gaseous or particulate matter on sensitive uses. Furthermore, the comment states that the horizon year of the Metropolitan Bakersfield General Plan (MBGP) is 2020; therefore, any development beyond the year 2020 is not accounted for or analyzed by the MBGP and its EIR. The comment suggests that the proposed project is revised to include a finding of significance because the proposed project is not accounted for in the MBGP and/or Kern County General Plan growth projections and is beyond the 2020 horizon analyzed in the MBGP Plan EIR.	

Land Use and Planning - Growth Projections	The comment states that because the proposed project is not accounted for in the MBGP and/or Kern County General Plan growth projections and is beyond the 2020 horizon year analyzed in the MBGP Plan EIR, that the Draft EIR should be revised to include a finding of significance.	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. CEQA Guidelines Section 15088.5 (f)(1) provides that when an EIR is revised and the entire EIR is recirculated, Kern County, as the Lead Agency, may require reviewers to submit new comments, and the Lead Agency need not respond to comments received during an earlier circulation period. Therefore, the County will respond in the Final DREIR only to new comments received regarding this DREIR, received during the new comment period.
Land Use and Planning - Land Use Designation	The comment states that Draft EIR has not provided a description of the proposed new Service Industrial land use designation; therefore, does not comply with CEQA's requirements for adequate informational documents and meaningful disclosure (CEQA § 15121). The comment suggests the proposed project include a detailed description of the new Service Industrial land use designation.	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. CEQA Guidelines Section 15088.5 (f)(1) provides that when an EIR is revised and the entire EIR is recirculated, Kern County, as the Lead Agency, may require reviewers to submit new comments, and the Lead Agency need not respond to comments received during an earlier circulation period. Therefore, the County will respond in the Final DREIR only to new comments received regarding this DREIR, received during the new comment period.
Land Use and Planning - Kern COG'S 2022 Regional Transportation Plan (RTP)	The comment states that the proposed project does not provide a consistency analysis with Kern COG'S 2022 Regional Transportation Plan (RTP). Additionally, the comment states that the proposed project is directly inconsistent with Goal 1 to improve the mobility of people and freight, Goal 3 to improve the reliability and safety of the transportation system, and Goal 5 to promote livable communities and satisfaction of consumers with the transportation system. The comment suggests that the EIR be revised to include findings of significance due to inconsistency with the 2022 RTP document.	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 4.16, *Transportation and Traffic.*
Population and Housing – Cumulative Impacts	The comment states that the EIR be revised to include a growth projection analysis and a cumulative analysis of projects approved since 2020 and projects in the pipeline to determine if the proposed project will exceed the employment and/or population growth forecast. Additionally, the comment suggests that the cumulative analysis includes an analysis of the proposed project's potential to exceed the employment/population growth forecasts by Kern COG, Kern County General Plan and/or the MBGP.	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 4.16, *Transportation and Traffic*.
Transportation and Traffic – VMT Analysis	The comment states that the EIR be revised to quantify truck/trailer and operational delivery van activity.	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 4.16, *Transportation and Traffic*.
Transportation and Traffic – TAZ Data Sheets	The comment states that EIR should be revised to include the KernCOG modeling input/output sheets for review, analysis, and comment by the public and decision makers.	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 4.16, *Transportation and Traffic*.

Transportation and Traffic – Geometric Design Feature	The comment states that Draft EIR does not analyze the potential to substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) nor does project's potential to result in inadequate emergency access. Additionally, the comment notes that the proposed project excluded specific truck/trailer turning exhibits from public review, such as depicting the available maneuvering and queueing space for trucks/trailers at the intersection of the project driveways and the adjacent streets. For these reasons, the comment suggests the EIR be revised to include a finding of significance.	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 4.16, *Transportation and Traffic*.
Transportation and Traffic – Project Access, Street Design, and Emergency Access	The comment states that Draft EIR does not provide sufficient evidence to support a less than significant finding regarding the proposed project's compliance or noncompliance with County's requirements for access, street design, or emergency access. The comment recommends revising the EIR to include a finding of significance.	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 4.16, *Transportation and Traffic*.
Irreversible Impacts – Cumulative analysis	The comment states that the Draft EIR does not include the buildout conditions of the City's General Plan to demonstrate the impact of the proposed project in a cumulative setting. The comment recommends the EIR be revised to include an additional analysis on the total developable building floor area within the Industrial land use designations, cumulative development, and include a finding of significance.	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. CEQA Guidelines Section 15088.5 (f)(1) provides that when an EIR is revised and the entire EIR is recirculated, Kern County, as the lead agency, may require reviewers to submit new comments, and the lead agency need not respond to comments received during an earlier circulation period. Therefore, the County will respond in the Final DREIR only to new comments received regarding this DREIR, received during the new comment period.
Irreversible Impacts – Project Components, Construction, and Operations	The comment states that the Draft EIR does not provide an analysis of the proposed project's commitment of resources or the proposed components, construction, or operations. The comment recommends revising the EIR to include a finding of significance.	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. CEQA Guidelines Section 15088.5 (f)(1) provides that when an EIR is revised and the entire EIR is recirculated, Kern County, as the lead agency, may require reviewers to submit new comments, and the lead agency need not respond to comments received during an earlier circulation period. Therefore, the County will respond in the Final DREIR only to new comments received regarding this DREIR, received during the new comment period.
Growth Inducement – Growth Projections	The comment states that the proposed project is inconsistent with regional and local growth forecasts. The comment states that the proposed project represents 33.2% of the Metro Bakersfield's employment growth between 2020 and 2035, representing a significant amount of growth for the region. Therefore, the comment recommends the EIR be revised to include a cumulative analysis discussion based on this growth and other industrial projects, in addition to those approved since RTP adoption to determine if the proposed project will exceed the employment/population growth forecasts by Kern COG, Kern County General Plan and/or the MBGP.	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. CEQA Guidelines Section 15088.5 (f)(1) provides that when an EIR is revised and the entire EIR is recirculated, Kern County, as the lead agency, may require reviewers to submit new comments, and the lead agency need not respond to comments received during an earlier circulation period. Therefore, the County will respond in the Final DREIR only to new comments received regarding this DREIR, received during the new comment period.

Growth Inducement – Horizon Year	The comment states that the Draft EIR is not accounted for in the MBGP and/or Kern County General Plan growth projections and is beyond the 2020 horizon year analyzed in the MBGP Plan EIR. The comment suggests that the proposed project's analysis should be revised to include a cumulative analysis of all light industrial projects approved since the adoption of MBGP to quantify the existing buildout scenario of the MBGP and/or the Kern County General Plan.	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. CEQA Guidelines Section 15088.5 (f)(1) provides that when an EIR is revised and the entire EIR is recirculated, Kern County, as the lead agency, may require reviewers to submit new comments, and the lead agency need not respond to comments received during an earlier circulation period. Therefore, the County will respond in the Final DREIR only to new comments received regarding this DREIR, received during the new comment period.
Growth Inducement – Land Use Designation	The comment states that the proposed project does not provide a description of the proposed new Service Industrial land use designation nor discuss the growth inducing impacts or irreversible impacts of creating a new land use designation. The comment suggests that the EIR is revised to include a finding of significance.	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. CEQA Guidelines Section 15088.5 (f)(1) provides that when an EIR is revised and the entire EIR is recirculated, Kern County, as the lead agency, may require reviewers to submit new comments, and the lead agency need not respond to comments received during an earlier circulation period. Therefore, the County will respond in the Final DREIR only to new comments received regarding this DREIR, received during the new comment period.
Alternatives	The comment states that Draft EIR does not evaluate a reasonable range of alternatives as it did not include one that eliminates all the proposed project's significant and unavoidable impacts. The comment recommends revising the EIR to include an alternative that reduces all significant and unavoidable impacts to foster informed decision making.	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Chapter 6, *Alternatives.*
Conclusion	The comment requests to be added to the public interest list regarding any subsequent environmental documents, public notices, public hearings, and notices of determination for this proposed project.	The comment does not raise a substantive issue on the content of the Draft EIR.
Center for Biological Diversity		
Introduction	The comment states that the proposed project's industrial development in unincorporated Kern County would cause negative impacts to air quality and greenhouse gas emissions. The comment also states that the proposed project may have other impacts to biological resources, water supply, and traffic, among others.	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR, Section 4.3, 4.4, 4.08, 4.10, and 4.16.
GHG – Mitigation	The comment states that the Draft EIR's analysis of the proposed project's greenhouse gas ("GHG") emissions do not fully analyze or mitigate the significant GHG impacts during the proposed project's construction and operation.	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 4.8, *Greenhouse Gas Emissions.*
Climate Change	The comment provides a summary of human-caused climate change and provides data provided by the International Panel on Climate Change (IPCC) data for carbon reductions to avoid the worst dangers of climate change. The comment states that the Draft EIR's decision on significant climate change impacts is alarming.	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 4.8, *Greenhouse Gas Emissions.*

GHG – Supportive Findings	The comment states that the Draft EIR's GHG analysis does not support the conclusion that the proposed project's 77,974 MTCO2e of annual emissions will not be significant. The comment notes that the Draft EIR does not apply CARB's quantitative threshold of 7,000 MTCO2e per year, and because the emissions are 11 times that threshold, GHG impacts would be significant under the CARB threshold. Additionally, the comment states that the Draft EIR should explain how the impacts of the proposed project would comply and remain consistent with the State's current GHG policy.	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 4.8, *Greenhouse Gas Emissions.*
GHG – Significant Impacts	The comment states that the proposed project's anticipated annual GHG emissions of almost 70,000 MTCO2e annually is significant. The comment suggests that the Draft EIR's GHG emission analysis is revised to better articulate the significant impacts of the proposed project and to support informed decision-making and public transparency.	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 4.8, *Greenhouse Gas Emissions.*
Mitigation Measure - GHG Analysis	The comment recommends that Draft EIR's GHG analysis is revised to include more robust mitigation, including rooftop solar panels to meet the energy needs of the project and infrastructure for electric trucks.	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 4.8, *Greenhouse Gas Emissions.*
Energy Needs-100% Rooftop Solar	The comment recommends that the proposed project incorporates rooftop solar panels to meet 100 percent of the building's energy needs, instead of an unspecified "portion" of them (DEIR at 1-69 [MM 4.6-1].)	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 4.8, *Greenhouse Gas Emissions.*
Electric Truck Infrastructure	The comment states that emissions from heavy-duty diesel trucks are one of the most harmful effects of warehouse development and that the only way to fully mitigate this harm is by transitioning to zero emissions heavy-duty trucks as quickly as possible. Therefore, the comment recommends that the Draft EIR offer more electric truck charging infrastructure to meet the demands of the fleet mix of 2040. The comment states that the proposed project should have an electric truck charging station to allow every truck that serves the proposed project to be charged. Additionally, the comment states that the proposed project should also have electric plugs for electric transport refrigeration units at every dock door. Lastly, the comment recommends that the energy use of an all-electric fleet is added to the proposed project's projected electricity use.	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 4.8, *Greenhouse Gas Emissions.*
Mitigation Measure – Air Quality	The comment states that the Draft EIR does not disclose a mitigation plan nor provide a list of the mitigation measures considered. Moreover, the comment notes that the Draft EIR has not established how the proposed project would effectively reduce the air quality impact to less than significant. The comment recommends that Draft EIR's air quality impacts are revised, and mitigation is added to reduce the impacts identified.	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 4.3, *Air Quality*.

Electrical Equipment on Site	The comment states that the California Attorney General recommends that all electrical equipment used on-site should be zero-emission. However, the Draft EIR only requires the use of electric construction equipment "whenever possible" and does not include any requirement to electrify operational equipment. Additionally, the comment states that CARB provides incentive funding to purchase zero emissions equipment through the Clean Off-Road Equipment Voucher Incentive. The comment states the Draft EIR did not provide substantial evidence that this measure is infeasible.	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 4.3, *Air Quality*.
Idling times	The comment states that the Draft EIR does not include mitigation measures to limit the amount of time that trucks are allowed to idle. The comment recommends that this mitigation measure is included in the revised Draft EIR.	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 4.3, *Air Quality*.
VOC Emissions	The comment states that the Draft EIR does not adopt mitigation measures to limit the VOC level in architectural paints and coatings, although the California Attorney General recommends a 10 g/L limit; and therefore, does not comply with the Attorney General's best practices.	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 4.3, *Air Quality*.
Conclusion	The comment recommends that a revised Draft EIR is recirculated before considering approval of the proposed project. Additionally, the comment requests that the Center is added to the notice list for all future updates to the proposed project.	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. The comment does not raise a substantive issue on the content of the Draft EIR and CEQA guidelines.
Center on Race Poverty & The Environment		
Introduction	The comment states the Draft EIR does not address the potential disproportionate impacts on low-income and communities of color and recommends that the proposed project consider its civil rights responsibilities under Government Code § 11135. They contend that because the proposed project will rely on state financial assistance to develop the necessary infrastructure, the proposed project has civil rights obligations to ensure a decision does not result in the unmitigated concentration of polluting activities near these communities. The comment claims that the Draft EIR in its current form, allows for these polluting facilities in low-income communities, and thus, in violation of civil rights law.	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Sections 4.3 *Air Quality*, 4.8 *Greenhouse Gas Emissions and Energy*.

Mitigation Measures/Key Impacts/ Alternatives	The comment states that without considering the Burbank Street expansion and interchange, the proposed project has not considered the “whole of the action” which significantly alters the nature and scope of the proposed project. Therefore, without the consideration of extensions, key impacts, mitigation measures, and alternatives are improper and incomplete. The comment warns of illegal piecemealing without consideration of freight extension projects at the project site. The comment states that without future truck routes, the Draft EIR does not properly identify sensitive receptors. The comment recommends recirculating the EIR to evaluate the indirect and cumulative impacts of the Burbank Street expansion, which are essential for Phase 2. They also assert that the EIR does not assess future expansions or their cumulative effects, violating CEQA’s requirement to consider the "whole of the action.	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Chapter 3, *Project Description*.
Existing Baseline	The comment states that the Draft EIR does not adequately describe the existing conditions of the site including air quality, water quality, groundwater supply, hazards, and the associated levels of contamination. The comment states the baseline is incomplete because it does not provide sufficient detail.	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 4.3 Air Quality, 4.9 Hazards and Hazardous Materials, 4.10 Hydrology and Water Quality.
Cumulative Impacts	The comment claims that the Draft EIR has not adequately analyzed cumulative impacts. The comment points out that the Draft EIR use of a 1-mile and 6-mile perimeter is arbitrary and therefore provides an incomplete analysis. Furthermore, the comment provides that the Draft EIR omits several goods movement projects that would generate similar impacts to the proposed project. The comment states that the Draft EIR provided no technical evidence for the six-mile buffer as an appropriate distance to use when measuring cumulative impacts on the environment and health. Therefore, the comment requests that the EIR prepare a project list based on similar impacts to the proposed project to the same communities that would be impacted by the proposed project, and to define the perimeter to include all communities along the major truck and rail routes that would serve the proposed project.	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Chapter 5, Consequences of Project Implementation.
Air Quality-Analysis	The comment states that the air quality section of the DEIR is incomplete, as it does not fully inform the public and governing agencies. The comment states that the Ambient Air Quality Analysis (AAQA) only focuses on-site emissions and does not include mobile emissions outside the project boundary. The number of vehicles used in calculations and the methodology for estimating pollutant concentrations, are missing. The comment states that the report lacks transparency in its conclusions, including the claim of a 96.81% reduction in mobile emissions. The comment requests the EIR to clarify its methodology, as the current analysis does not meet CEQA’s standards for comprehensive environmental review.	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 4.3, *Air Quality*.

Air Quality-HRA	The comment states that Draft EIR does not analyze off-site and long-term emissions. The comment states that long term operations for NOX are over five times over the significance threshold, and PM10 are double. For this reason, the comment states the logical conclusion is that the EIR would include significant impacts for these criteria pollutants.	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 4.3, *Air Quality*.
Air Quality-Traffic Analysis	The comment claims that the Draft EIR's traffic analysis is contradictory and insufficient. The comment states that the number of vehicles, distances traveled, hours of operation, and emission sources are missing and that the travel estimates in the Air Quality Impact Analysis (AQIA are inconsistent with other areas of the Draft EIR. They state that AQIA) does not explain its methodology and doesn't clarify vehicle types or trip calculations. Without this information and corrections, the comment states the AQIA fails to provide the public and decision-makers with accurate information regarding the proposed project's air quality impacts. The comment also provides that the Draft EIR does not clarify if the 13,575 trips/day includes off-road equipment, haul-truck trips, and on-road worker vehicle trips. Additionally, the Draft EIR only provides a percentage of truck trips, which is not informative. Furthermore, the Draft EIR, the proposed project relies on the Burbank Street expansion, with the implication that this is due to a level of traffic increase, however, is not discussed. Overall, the comment states that the community is left to interpret the analysis without these clarifications and corrections, which violates CEQA.	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 4.3, *Air Quality* and Section 4.16, *Transportation and Traffic.*
Air Quality-Fugitive Dust Emissions	The comment states that the Draft EIR inadequately addresses fugitive dust emissions, despite recognizing its contribution to air pollution and health hazards. The comment states that the Draft EIR does not discuss specific sources and provides that rural communities may have higher levels of fugitive dust levels, specifically along truck routes that also are common for tree nut harvesting. While acknowledging potential health risks, the report excludes a significant portion of vehicle travel from its air quality evaluation, underestimating the environmental impact. The comment states the Draft EIR relies solely on APCD rules for mitigation, without substantial justification on how they would fully address direct, indirect, and cumulative effects. As a result, the DEIR does not meet CEQA's requirements for proposing all feasible mitigation measures.	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 4.3, *Air Quality*.
Air Quality-Refrigerated Warehouse & Transport Refrigeration Units	The comment states that Draft EIR does not analyze the additional air pollution impacts from refrigerated warehouses and TRUs. The Air Quality Impact Analysis (AQIA) only models' emissions for unrefrigerated warehouses, omitting significant pollutants affecting the project site and truck routes. that the comment states that these emissions could worsen air quality and increase health risks such as cancer, and therefore, the Draft EIR is incomplete as it does not provide for an informed decision.	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 4.3, *Air Quality*.

Air Quality-Mitigation Measures	The comment states that Draft EIR's mitigation measures are ineffective because they primarily address dust and construction-related impacts, while offsite emissions are identified as a major AQ concern. The comment notes that the draft EIR acknowledges the proposed project's contributions, to multiple criteria pollutants, some exceeding applicable standards, yet concludes the impacts are acceptable. The commenter asserts that under CEQA, allowing a project to contribute insufficiently mitigated air pollution to an air basin in nonattainment is both legally impermissible and poor policy.	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 4.3, *Air Quality*.
Air Quality-Cumulative Analysis	The comment states that the Draft EIR acknowledges 36 planned projects within a 6-mile radius but concludes there is no available information about them. The Draft EIR concludes that the proposed project would exceed significance thresholds and therefore, significant cumulative impact on air quality and pollutants, such as ozone and particulate matter. The comment states that there are more cumulative impacts including increased PM and NOx.	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 4.3, *Air Quality*.
Air Quality-HRA	The comment states that the DEIR omits accurate air pollution levels because of the incomplete air quality analysis and does not provide the required health effect disclosures based on the disclosure of air pollution. Due to this, the comment states the EIR should be recirculated to include a detailed discussion of the full air quality impact on health, including a Health Risk Assessment (HRA).	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. The Air Quality Impact Analysis was revised and included in the DREIR. See DREIR Section 4.3, *Air Quality* and Appendix D, *Air Quality Impact Analysis*.
Air Quality-State and Local Standards	The comment claims that the project description and mitigation measures are inconsistent with state and local recommendations and standards. Specifically, CARB setback recommendation of 500 feet from major diesel emissions sources for sensitive land uses and AB 617, recognizes Shafter as a community with a Community Emissions Reduction Plan including proposals to replace heavy duty vehicles with zero-emission vehicles, which the Draft EIR does not mention.	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 4.3, *Air Quality*.

Transportation & Traffic- Traffic Study	The comment states that Draft EIR identifies significant and unavoidable impacts but omits feasible mitigation due to gaps in evaluating environmental and public health impacts. It also states the traffic study is insufficient and includes unsupported conclusions lacking transparent assumptions or sources. The comment notes inconsistencies in truck trip estimates, an arbitrarily shaped study area, and a failure to analyze potential impacts near Shafter. These issues, the commenter argues, result in underestimated impacts on traffic, air quality, and environmental justice, in violation of CEQA.	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 4.3 Air Quality and 4.16, Transportation and Traffic.
Transportation & Traffic- VMT Analysis	The comment states that the VMT analysis is inadequate due to the Draft EIR relying on thresholds for "office space" projects as the basis for its analysis. The comment concludes that the study analysis did not evaluate construction traffic or the on- and off-site truck traffic that would be generated by the proposed project, thereby providing an incomplete VMT analysis. The comment suggests the proposed project relies on existing resources to develop a methodology for estimated heavy-duty truck VMT.	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 4.16, *Transportation and Traffic.*
Transportation & Traffic- LOS	The comment states that Draft EIR has improperly relied on the level of service (LOS) as a threshold for significant transportation impact. They state that the proposed project should use VMT as the proper metric for analyzing transportation impacts rather than LOS, and the EIR should be recirculated with valid VMT analysis.	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 4.16, *Transportation and Traffic.*
Transportation & Traffic- Shafter's General Plan	The comment states that Draft EIR does not consider consistency with Shafter's General Plan policies, specifically transportation and circulation policies. Specifically, establishing truck routes away from residential areas and that developments should be responsible for impacts through mitigation fee programs and landscape requirements	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 4.16, *Transportation and Traffic.*
Transportation & Traffic- Hazards	The comment states that the Draft EIR underestimates transportation hazards from the proposed project by falling short of considering the hazards from adding thousands of heavy-duty trucks per day onto nearby roads, including in the City of Shafter, which is an overburdened unincorporated community where such an increase in truck traffic would be incompatible. The comment states that increased truck traffic generated by warehouse and goods movement projects like this one will not only increase the hazards for passenger vehicles but will exacerbate an already unsafe environment for non-drivers in Kern County and Shafter where there is underinvestment in road infrastructure. The comment also lists accidents involving semi-trucks in Kern County's rural roads, pointing to the increased truck traffic along SR-99, ranked as the deadliest highway in California in 2024 generated by the proposed project.	The EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 4.16, *Transportation and Traffic.*
Transportation & Traffic- Cumulative Impact	The comment states that cumulative transportation impact is underestimated because the Draft EIR leaves off facilities and proposals that would contribute toward increased truck traffic, concluding that the proposed transportation mitigation measures are inefficient.	The EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 4.16, *Transportation and Traffic.*

Water Quality and Supply	The comment states that the description of water use by the proposed project is inadequate and incomplete. The comment states that the proposed project does not provide such a statement regarding water impacts and therefore should recirculate an updated analysis.	CEQA Guidelines Section 15088.5 (f)(1) provides that when an EIR is revised and the entire EIR is recirculated, Kern County, as the lead agency, may require reviewers to submit new comments, and the lead agency need not respond to comments received during an earlier circulation period. Therefore, the County will respond in the Final DREIR only to new comments received regarding this DREIR, received during the new comment period.
APCD-GHG Thresholds	The comment states that because the Draft EIR relies on significance thresholds developed by the Air Pollution Control District (APCD), Kern County should develop their own GHG thresholds due to the increase of these types of proposed projects in the region and the outsized impact from the transportation sector on climate change.	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 4.8, *Greenhouse Gas Emissions.*
Hazards and Hazardous Materials-Pesticides	The comment states that the Draft EIR does not analyze whether organochlorine pesticides are within the project site's soil and suggests a more thorough analysis should be undertaken to avoid the lasting effects of pesticides on the project site as the current analysis is insufficient.	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 4.9, *Hazards and Hazardous Materials*.
Hazards and Hazardous Materials - General Plan Consistency	The comment states that although the DEIR cites hazardous conditions from 1989 to 2019, it does not provide an analysis of current conditions or proper analysis of the property.	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 4.9, *Hazards and Hazardous Materials*.
Growth-Inducing Impacts	The comment claims that Draft EIR's growth-inducing impacts analysis is incomplete, as it only focuses on job creation, and housing and population associated with those jobs. The comment states the Draft EIR does not justify employment estimates or address the loss of over 700 acres of agricultural land. It does not consider whether displaced agricultural workers could transition to warehouse jobs. Additionally, the comment states that the report ignores the broader impact of increased freight throughput in Kern County, which will lead to significant environmental and traffic changes. The comment suggests a proper analysis for growth-inducing impacts and freight cargo movement.	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 5.4, *Growth Inducement.*
Biological Resources-Special Status Species	The comment states that the Draft EIR does not adequately assess the proposed project's impact on special status species and habitats. It claims that it narrowly defines the environmental setting, excluding truck and rail routes, and overlooks preserved land like the Buttonwillow Ecological Reserve.	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 4.4, *Biological Resources.*
Biological Resources-Survey	The comment states that the Biological Reconnaissance Survey is outdated and lacks details on methodology, potentially underestimating species' presence.	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 4.4, *Biological Resources.*

Aesthetics	The comment states that the analysis in the Draft EIR focuses only on future building designs, ignoring the aesthetic impact of increased truck and freight traffic. They assert that proposed mitigation measures address building and landscaping but do not account for roadway impacts. Additionally, the Draft EIR identifies unavoidable cumulative effects, including increased light pollution and sky glow, yet does not propose feasible solutions.	CEQA Guidelines Section 15088.5 (f)(1) provides that when an EIR is revised and the entire EIR is recirculated, Kern County, as the lead agency, may require reviewers to submit new comments, and the lead agency need not respond to comments received during an earlier circulation period. Therefore, the County will respond in the Final DREIR only to new comments received regarding this DREIR, received during the new comment period.
Feasible Mitigation Measures	The comment states that the analysis in the Draft EIR does not discuss all available measures that could mitigate an impact and describes the basis for selecting the appropriate measures, resulting in inadequate mitigation measures. The comment asks that the proposed project adopt additional feasible mitigation to reduce the proposed project's impact before certifying the EIR.	CEQA Guidelines Section 15088.5 (f)(1) provides that when an EIR is revised and the entire EIR is recirculated, Kern County, as the lead agency, may require reviewers to submit new comments, and the lead agency need not respond to comments received during an earlier circulation period. Therefore, the County will respond in the Final DREIR only to new comments received regarding this DREIR, received during the new comment period.
Air Quality	The comment states that air quality impacts, including emissions, are not analyzed or described in the Draft EIR. The comment recommends the EIR establish truck routes through an open process involving residents. The comment suggests that before approving building permits, a truck route plan with public input should outline operational hours, stored items, designated routes, and measures to prevent street congestion. Facility operators must follow the plan, and new tenants must submit revisions before obtaining a business license. Landowners and tenants should meet milestones for adopting zero-emission vehicles, equipment, charging stations, and grid infrastructure, ensuring emissions are assessed over the fuel's full life cycle. Additionally, air filters should be regularly provided to residents within a mile of the project site and truck routes.	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 4.3, *Air Quality*.
Water Impact Analysis	The comment states that the Draft EIR underestimates the proposed project's environmental effects, leading to inadequate mitigation measures that would not neutralize the proposed project's negative impacts. The comment also states that the proposed project should also develop new mitigation measures based on an updated and more accurate water impact analysis.	CEQA Guidelines Section 15088.5 (f)(1) provides that when an EIR is revised and the entire EIR is recirculated, Kern County, as the lead agency, may require reviewers to submit new comments, and the lead agency need not respond to comments received during an earlier circulation period. Therefore, the County will respond in the Final DREIR only to new comments received regarding this DREIR, received during the new comment period.
Water Quality - Groundwater Mitigation Measures	The comment states that the Draft EIR does not provide an adequate mitigation measure for the decrease in groundwater supply and therefore Mitigation Measure 4.18-2 should be implemented to ensure that any groundwater or reclaimed water used is accounted for, should the proposed project require additional water supply over the allotment from the district." This measure allows the operator to collect information on groundwater or reclaimed water usage before building permits, and it requires that water meters be installed to monitor water use.	CEQA Guidelines Section 15088.5 (f)(1) provides that when an EIR is revised and the entire EIR is recirculated, Kern County, as the lead agency, may require reviewers to submit new comments, and the lead agency need not respond to comments received during an earlier circulation period. Therefore, the County will respond in the Final DREIR only to new comments received regarding this DREIR, received during the new comment period.

Water Quality - Flood Prevention Mitigation Measure	The comment states that the Draft EIR relies on a 2008 FEMA flood map alone to conclude that there is a 0.2% chance of flooding, which is inefficient due to recent years of climate change. Additionally, the comment claims that Draft EIR does not adequately consider the proposed infrastructure to inform a feasible mitigation measure, because of all the additional impervious surface the proposed project would add. For the above reasons, the comment states that the Draft EIR has failed to inform feasible mitigation measure.	CEQA Guidelines Section 15088.5 (f)(1) provides that when an EIR is revised and the entire EIR is recirculated, Kern County, as the lead agency, may require reviewers to submit new comments, and the lead agency need not respond to comments received during an earlier circulation period. Therefore, the County will respond in the Final DREIR only to new comments received regarding this DREIR, received during the new comment period.
Mitigation Measure - Transportation	The comment states that the following mitigation measures should be included to address the direct, indirect, and cumulative transportation impacts. • Additional mitigation measures for VMT impacts following a complete VMT analysis if it determines a significant impact. Recommendations of specific mitigation measures from the comment include fee programs, transportation management plans, and VMT reduction initiatives. Truck routes should avoid residential areas, and facility operators must follow an approved routing plan. Local transit agencies should enhance worker transportation, and developers must create a construction traffic control plan to minimize disruptions, and Transportation Traffic Impact fee.	The EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 4.16, *Transportation and Traffic.*
Mitigation Measures – Health	The comment recommends the proposed project develop and adopt mitigation measures to mitigate cumulative impacts, particularly on health. The comment proposes requiring tenants to adopt the cleanest available technology over time and ensuring mitigation measures remain flexible for future improvements. They also suggest incorporating mitigation strategies from the Attorney General's Warehouse Best Practices guidelines.	CEQA Guidelines Section 15088.5 (f)(1) provides that when an EIR is revised and the entire EIR is recirculated, Kern County, as the lead agency, may require reviewers to submit new comments, and the lead agency need not respond to comments received during an earlier circulation period. Therefore, the County will respond in the Final DREIR only to new comments received regarding this DREIR, received during the new comment period.
Mitigation Measures - General	The comment states that an EIR should do more than mention the impact but should actively include those impacts within its analysis.	CEQA Guidelines Section 15088.5 (f)(1) provides that when an EIR is revised and the entire EIR is recirculated, Kern County, as the lead agency, may require reviewers to submit new comments, and the lead agency need not respond to comments received during an earlier circulation period. Therefore, the County will respond in the Final DREIR only to new comments received regarding this DREIR, received during the new comment period.
Alternatives	The comment states that the alternatives analysis in Draft EIR does not consider other feasible alternatives and lacks detail necessary for meaningful public input and informed decision-making. Additionally, the comment states that Draft EIR has not considered alternatives that would comply with CARB guidance calling for warehouse facilities to be located at least 1,000 feet from sensitive receptors. The comment requests that the EIR include alternative locations remote enough to avoid adverse harm to other communities.	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Chapter 6, *Alternatives.*

Public Review	The comment states that the proposed project should provide opportunities for the public to ask questions and provide comments on the proposed project's environmental analyses and have their input incorporated into decision-making, mitigation measures, and the EIR. The comment supports their concern by stating that the proposed project declined a request for additional time to review over 4,000 pages of technical materials and to hold a public hearing ahead of the close of the public comment period. The comment states that the proposed project did not sufficiently justify why it does not provide notice of the Draft EIR in Spanish and does not translate any portion of the Draft EIR into Spanish or other commonly spoken languages.	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Chapter 2, I*ntroduction*. As specified in CEQA Guidelines §15105(a), "the public review period for a draft EIR should not be less than 30 days nor longer than 60 days except in unusual circumstances. When a draft EIR is submitted to the State Clearinghouse for review by State agencies, the public review period shall not be less than 45 days." Section 15087(e) of the State CEQA Guidelines further specifies that "the public review period shall be at least as long as the review period established by the Clearinghouse." Circulation of the Malibu Vineyards Industrial Parkway Project began on July 15, 2024, and ended on August 29, 2024, for the required 45-day public review and comment period. However, while the comment period may close for purposes of meeting the above-listed CEQA Guidelines, it is a policy of the Kern County Planning and Natural Resources Department to accepts all comments on the Draft EIR and the proposed project throughout the entire application process. The proposed project will be noticed and considered by the Kern County Planning Commission , and then will be considered at a noticed public hearing before the Board of Supervisors. All comments received will be included in the administrative record for consideration by the decision makers and written replies will be provided through the Final EIR – Response to Comments, staff reports, and presentations at the hearings. The Draft EIR meets all the legal requirements of CEQA, including for notification. As validated by the 5th District Court of Appeals on two occasions, translation of any portion of the Draft EIR is not required by law. The Draft EIR was posted online, and online translation software can be used at the discretion of the reader for access.
Western States Regional Council of Carpenters		
Introduction	The comment requests that all notices referring to or related to the proposed project are notified by the Western States Regional Council of Carpenters (WSRCC).	Commenters have been included on the mailing list.
Community and Economic development	The comment recommends that the proposed project requires construction of the proposed project to be built by contractors who participate in a Joint Labor-Management Apprenticeship Program approved by the State of California and make a commitment to hiring a local workforce.	CEQA Guidelines Section 15088.5 (f)(1) provides that when an EIR is revised and the entire EIR is recirculated, Kern County, as the lead agency, may require reviewers to submit new comments, and the lead agency need not respond to comments received during an earlier circulation period. Therefore, the County will respond in the Final DREIR only to new comments received regarding this DREIR, received during the new comment period.

Covid-19 and other infectious diseases	The comment states that construction work has been defined as a Lower to High-risk activity for COVID-19 spread by the Occupations Safety and Health Administration. The comment recommends additional requirements to mitigate public health risks from the proposed project's construction activities. Additionally, the comment requests that the proposed project should require safe on-site construction work practices as well as training and certification for any construction workers on the project site and construction activities conducted at the project site adhere to the following guidelines: Construction Site Design: • The project site will be limited to two controlled entry points. • Entry points will have temperature screening technicians taking temperature readings when the entry point is open. • The Temperature Screening Site Plan shows details regarding access to the project site and project site logistics for conducting temperature screening. • A 48-hour advance notice will be provided to all trades prior to the first day of temperature screening. • The perimeter fence directly adjacent to the entry points will be clearly marked indicating the appropriate 6-foot social distancing position for when you approach the screening area. Please reference the Apex temperature screening site map for additional details. • There will be clear signage posted at the project site directing you through temperature screening. • Provide hand washing stations throughout the construction site. Testing Procedures: • The temperature screening being used are non-contact devices. • Temperature readings will not be recorded. • Personnel will be screened upon entering the testing center and should only take 1-2 seconds per individual. • Hard hats, head coverings, sweat, dirt, sunscreen or any other cosmetics must be removed on the forehead before temperature screening. • Anyone who refuses to submit to a temperature screening or does not answer the health screening questions will be refused access to the project site. • Screening will be performed at both entrances from 5:30 am to 7:30 am.; main gate [ZONE 1] and personnel gate [ZONE 2] • After 7:30 am only the main gate entrance [ZONE 1] will continue to be used for temperature testing for anybody gaining entry to the project site such as returning personnel, deliveries, and visitors.	CEQA Guidelines Section 15088.5 (f)(1) provide that when an EIR is revised and the entire EIR is recirculated, Kern County, as the lead agency, may require reviewers to submit new comments, and the lead agency need not respond to comments received during an earlier circulation period. Therefore, the County will respond in the Final DREIR only to new comments received regarding this DREIR, received during the new comment period.

	• If the digital thermometer displays a temperature reading above 100.0 degrees Fahrenheit, a second reading will be taken to verify an accurate reading. • If the second reading confirms an elevated temperature, DHS will instruct the individual that he/she will not be allowed to enter the project site. DHS will also instruct the individual to promptly notify his/her supervisor and his/her human resources (HR) representative and provide them with a copy of Annex A Planning • Require the development of an Infectious Disease Preparedness and Response Plan that will include basic infection prevention measures (requiring the use of personal protection equipment), policies and procedures for prompt identification and isolation of sick individuals, social distancing (prohibiting gatherings of no more than 10 people including all-hands meetings and all-hands lunches) communication and training and workplace controls that meet standards that may be promulgated by the Center for Disease Control, Occupational Safety and Health Administration, Cal/OSHA, California Department of Public Health or applicable local public health agencies. Overall, the comment suggests that all construction workers undergo COVID-19 Training and Certification before being allowed to conduct construction activities at the project site and that the proposed project be built using a workforce trained in ICRA protocols.	
CEQA	The comment provides relevant CEQA case law and states that the Draft EIR failed to substantiate all of its conclusions to allow for meaningful public review and comment, provide adequate mitigation measures, and fully assess environmental factors.	CEQA Guidelines Section 15088.5 (f)(1) provide that when an EIR is revised and the entire EIR is recirculated, Kern County, as the lead agency, may require reviewers to submit new comments, and the lead agency need not respond to comments received during an earlier circulation period. Therefore, the County will respond in the Final DREIR only to new comments received regarding this DREIR, received during the new comment period.
Recirculation	The comment states the Draft EIR does not substantiate all its conclusions to allow meaningful public review and comment, provide adequate mitigation measures, nor fully assess all pertinent environmental factors. The comment suggests that the EIR be recirculated due to the above shortcomings.	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Chapter 2, I*ntroduction*.

Cumulative Impacts	The comment states the Draft EIR does not consider several nearby past development projects, in which the omission undermines the validity of the cumulative impacts analysis. Additionally, the comment states the Draft EIR's Cumulative Projects list omits previously completed large-scale projects within the 6-mile radius of the proposed project, and their associated environmental impacts, including Bakersfield's Meadows Field Airport and the Halliburton headquarters (located at the northwest corner of 7th Standard Road and Coffee Road). The comment recommends that the Draft EIR is revised to incorporate any significant past projects within the 6-mile cumulative projects radius, including the Meadows Field Airport and the Halliburton headquarters, in its cumulative impacts analysis.	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Chapter 5, *Consequences of Project Implementation*.
Mitigation Measures	The comment provides CEQA guidelines related to mitigation measures (CEQA Guidelines Section 15126.4(a)(1)(B)) as an introduction to why mitigation measures throughout the Draft EIR are inadequate.	CEQA Guidelines Section 15088.5 (f)(1) provide that when an EIR is revised and the entire EIR is recirculated, Kern County, as the lead agency, may require reviewers to submit new comments, and the lead agency need not respond to comments received during an earlier circulation period. Therefore, the County will respond in the Final DREIR only to new comments received regarding this RDEIR, received during the new comment period.
Mitigation Measure – Air Quality	The comment states the Draft EIR's Air Quality Mitigation Measures do not consider nor incorporate certain project design features and emission reduction strategies recommended by CAPCOA. The comment suggests that the Draft EIR is revised and recirculated to incorporate mitigation measures that co-benefit the proposed project's air quality impacts and GHG emissions impacts.	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 4.3, *Air Quality.*
Mitigation Measures - Improper Deferral	The comment states that deferring the formulation of a project's actual mitigation measures to some undefined time after the proposed project's approval is improper and cannot be used as a substitute for proper mitigation under CEQA.	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 4.3, *Air Quality.*
Mitigation Measures – Biological Resources	The comment states that Draft EIR fails to show why the proposed project's WEATP cannot be completed or achieved at this time prior to adoption of the Draft EIR, what impact the measures will have individually or cumulatively. Additionally, the comment states the proposed project's lack of explanation of how the mitigation measures would reduce biological resources impacts to a level of insignificance.	The EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 4.4, *Biological Resources.*
Mitigation Measure – Energy Use	The comment states the Draft EIR fails to show why the proposed project's report/summary of the energy efficiency building design standards cannot be completed or achieved at this time prior to adoption of the EIR or what impacts the measures will have individually or cumulatively. Additionally, the comment states that the proposed project lacks an explanation on how the measures would reduce the proposed project's energy use impacts to a level of insignificance.	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 4.6, *Energy*.

Mitigation Measure - GHG	The comment states that the Draft EIR does not make an adequate effort to reduce the proposed project's GHG impacts through project design features aimed at reducing GHG emissions. The comment suggests that the Draft EIR should incorporate mitigation against the proposed project's significant and unavoidable cumulative greenhouse gas impacts.	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 4.8, *Greenhouse Gas Emissions*.
Mitigation Measure – Hazards and Hazardous Materials	The comment states that the preparation of the Project's Spill Prevention Control and Countermeasures Response Plan (SPCCRP) and Hazardous Materials Business Plan (HMBP) outside the CEQA environmental review process denies the public and the County's decisionmakers of the opportunity to assess adequacy and comment upon such plans. Additionally, the comment states that the proposed mitigation measures are improperly deferred, shifting the burden to the Applicant without explaining how the measures would clearly reduce the hazards impact to a level of insignificance.	The Draft EIR has been recirculated pursuant to CEQA Guidelines Section 15088.5. See DREIR Section 4.9, *Hazards and Hazardous Materials*.
Mitigation Measure – Hydrology and Water Quality	The comment states that the Draft EIR reference to the proposed project's Stormwater Pollution Prevention Plan (SWPPP) and final hydrologic study and drainage plan in the mitigation measures fails to show why a SWPPP and/or a final hydrologic study and drainage plan cannot be completed or achieved at this time prior to adoption of the EIR, what impacts the measures will have individually or cumulatively, and the specific performance criteria the Applicant will have to meet regarding the measures. Likewise, the comment notes the preparation of the proposed project's Stormwater Pollution Prevention Plan (SWPPP) and final hydrologic study and drainage plan outside the CEQA environmental review process denies the public and the County's decisionmakers of the opportunity to assess the adequacy and comment upon such plans.	CEQA Guidelines Section 15088.5 (f)(1) provide that when an EIR is revised and the entire EIR is recirculated, Kern County, as the lead agency, may require reviewers to submit new comments, and the lead agency need not respond to comments received during an earlier circulation period. Therefore, the County will respond in the Final DREIR only to new comments received regarding this DREIR, received during the new comment period.
Conclusion	The comment requests that the Draft EIR be revised and recirculated pursuant CEQA.	The Draft EIR has been revised and recirculated pursuant to CEQA Guidelines Section 15088.5.

Appendix A.6

DEIR Comment Letters

This page intentionally left blank.

Lorelei H. Oviatt, AICP, Director
2700 "M" Street, Suite 100
Bakersfield, CA 93301-2323
Phone: (661) 862-8600
Fax: (661) 862-8601 TTY Relay 1-800-735-2929
Email: planning@kerncounty.com
Web Address: http://kernplanning.com/

PLANNING AND NATURAL RESOURCES DEPARTMENT

Planning
Community Development
Administrative Operations

To: **Justin Murray**
Malibu Vineyards, LP

Date: August 30, 2024

From: **Katrina Slayton, Division Chief**
Kern County Planning & Natural Resources Department, Advanced Planning

Phone: (661) 862-8957

RE: **Transmittal of public/agency comments received during circulation of Draft EIR for Malibu Vineyards Industrial Parkway by Malibu Vineyards, LP (PP21116)**

Please find attached the fourteen (16) written comments, and their respective attachments, received during the circulation of the Draft Environmental Impact Report for the above-noted project. The documents provided are as follows:

Commenter Name	Comment Date	Commenter Type
California Department of Transportation	08/09/2024	State
California Department of Fish and Wildlife	08/26/2024	State
California Air Resources Board	08/27/2024	State
California Department of Conservation Geological Energy Management	9/03/2024	State
Kern County Superintendent of Schools	07/26/2024	Local
Kern County Public Works Department—Development	08/07/2024	Local
Kern County Public Works Department—Survey	08/09/2024	Local
San Joaquin Valley Air Pollution Control District	9/30/2024	Local
Advocates for the Environment	07/29/2024	Interested Party
Center on Race, Poverty & the Environment, et al.	08/06/2024	Interested Party
SoCalGas—Transmission Department	08/13/2024	Interested Party
Supporters Alliance for Env Responsibility (SAFER) (Lozeau Drury, LLP)	08/16/2024	Interested Party
Golden State Env Justice Alliance (Blum)	08/28/2024	Interested Party
Center for Biological Diversity (31 attachments)	08/29/2024	Interested Party
Western States Carpenters (WSRCC) (Mitchell M. Tsai)	08/29/2024	Interested Party
Center on Race, Poverty & the Environment, et al. (37 attachments)	08/29/2024	Interested Party

Attachments

California Department of Transportation

DISTRICT 6 OFFICE
1352 WEST OLIVE AVENUE | P.O. BOX 12616 | FRESNO, CA 93778-2616
(559) 840-6066 | FAX (559) 488-4195 | TTY 711
www.dot.ca.gov

August 9, 2024

KER-99-32.57
NOA/DEIR
MALIBU VINEYARDS
INDUSTRIAL COMPLEX
GTS #: 17739
SCH# 2022080056

SENT VIA EMAIL

Katrina Slayton, Division Chief
Kern County Planning and Natural Resources Dept.
2700 'M' Street, Suite 100
Bakersfield, CA 93301

Dear Katrina Slayton:

Caltrans has completed a review of the Draft Environmental Impact Report (EIR) and Traffic Study (TS) for a proposed industrial complex within Kern County. The complex would encompass approximately twenty-four buildings on 739 acres of existing vineyards, located north of Imperial Avenue and east of State Route (SR) 99, with site access from Saco Road and Imperial Avenue. The project site is just east of the City of Shafter, and approximately one mile north of the City of Bakersfield.

The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. Caltrans reviews land use projects and plans through the lenses of our mission and state planning priorities of infill, conservation, and travel-efficient development. Caltrans provides the following comments consistent with the State's smart mobility goals that support a vibrant economy and sustainable communities:

The project, situated near the cities of Shafter and Bakersfield, is planned in two phases, resulting in approximately 8,908,000 square feet of total building floor area. Based on the TS and Institute of Transportation Engineers (ITE) Trip Generation Manual, the development is expected to generate approximately 1,033 AM peak hour and 1,177 PM peak hour trips (ITE Land Use Code: 150 Warehouse & 154 High-Cube Transload and Short-Term Storage Warehouse).

In addition to the proposed warehouse facilities, the preliminary site plan includes proposed right-of-way dedications for new local roads and a potential future SR 99 interchange near Burbank Street. While the Kern Council of Governments has included this interchange in its recent KARGO study, no formal alignments or funding have been established. Given the projected construction timing is beyond the study's 20-year

horizon. Based on the HDM 501.3 Traffic Interchanges standard, interchange spacing shall be two miles apart outside of urban areas. The spacing between SR 99/Lerdo Highway interchange and 7th Standard Road interchange is six miles. Burbank Street is approximately three miles north of 7th Standard Road. However, we concur with the right-of-way preservation of the future interchange.

As a point of information, the segment of SR 99 adjacent to the project site currently consist of a 6-lane freeway. Per the Caltrans Transportation Concept Report, the ultimate concept for SR 99 between post mile 32.1 and 44.3 is an 8-lane freeway within 218 feet of right of way (ROW). Existing ROW is currently set at 226 feet within the SR 99 segment of the project site. With the Southern Pacific Railroad situated along the west side of SR 99, it is anticipated that future SR 99 widening may need to be completed towards the east, adjacent to the project site. It is recommended for all future buildings and/or permanent structures be constructed with sufficient setback to accommodate the future widening.

We agree with the conclusion of the TIS as stated on page 39 of the report. Therefore, **the project proponent shall pay its proportional share for State facilities** as listed in Table 8 for Phases 1 and 2 and pay into the RTIF program by the current fee schedule prior to building permit for those portions of the project located within the RTIF boundary. The **project proponent shall prepare a cost estimate** for the recommended mitigations as listed in Table 8. The project proponent should also coordinate with the County on the development and funding of the additional freeway interchange(s) on State Route 99 in the vicinity of the Burbank Street alignment between 7th Standard Road and Lerdo Highway. **Caltrans requests that this be made as a condition of approval of the DEIR.**

1. There is an **error** in the fair share formula presented on page 36 of EIR.

    a. The formula currently reads: % Share = (Project Traffic / ((Future Traffic + Project Traffic) - Existing Traffic)) x 100%. This formula is incorrect, as it erroneously cancels out the Project Traffic in the denominator, thereby understating the fair share.

    b. The correct formula should be **% Share = (Project Traffic / (Future Traffic - Existing Traffic)) x 100%.**

       Thereby this adjustment is necessary to ensure that the calculation accurately reflects the fair share.

2. Alternative transportation policies should be applied to the development. An assessment of multi-modal facilities should be conducted to develop an integrated multi-modal transportation system to serve and help alleviate traffic congestion caused by the project and related development in this area of the County. The assessment should include the following:

    a. Pedestrian walkways should link this proposal to an internal project area

walkway, transit facilities, as well as other walkways in the surrounding area.

b. The Project might also consider coordinating connections to local and regional bicycle pathways to further encourage the use of bicycles for commuter and recreational purposes.
c. If transit is not available within ¼-mile of the site, transit should be extended to provide services to what will be a high activity center.

3. Caltrans recommends the Project implement "smart growth" principles regarding parking solutions, providing alternative transportation choices to employees in the vicinity. Alternative transportation choices may include but are not limited to parking for carpools/vanpools, car-share and/or ride-share programs.
4. Active Transportation Plans and Smart Growth efforts support the state's 2050 Climate goals. Caltrans supports reducing Vehicle Miles Traveled (VMT) and Green House Gas (GHG) emissions in ways that increase the likelihood people will use and benefit from a multimodal transportation network.
5. Based on Caltrans VMT-Focused Transportation Impact Study Guide, dated May 20, 2020, and effective as of July 1, 2020, Caltrans seeks to reduce single occupancy vehicle trips, provide a safe transportation system, reduce per capita Vehicle Miles Traveled (VMT), increase accessibility to destinations via cycling, walking, carpooling, transit and reduce greenhouse gas (GHG) emissions. Caltrans recommends that the project proponent continue to work with the County to further implement improvements to reduce vehicles miles traveled and offer a variety of transportation modes for its employees.
6. Caltrans recommends the Project provide charging stations *for electric vehicles and for freight trucking* as part of the statewide efforts to reduce greenhouse gas emissions, reduce freight parking shortages and maintain the Federal Hours of Service regulations.
7. Due to severe truck parking shortages throughout the state and strict Federal Hours of Service regulations that limit the amount of time a truck driver can spend driving per day, many truck drivers cannot find safe and reliable truck parking spaces, and therefore park in unauthorized and/or unsafe areas. Constructing adequate truck parking on-site can alleviate the unauthorized/unsafe truck parking demand on existing facilities. On-site freight parking for trucks will also strive to ensure a secure and reliable area for extended or overnight parking to help maintain adherence to the Federal Hours of Service regulations.
8. Therefore, Caltrans recommends that the Project implement on-site freight parking areas and/or spaces within the Project boundaries, that truck drivers can utilize for extending parking periods before loading or after unloading to alleviate freight parking shortages and maintain the Federal Hours of Service regulations. It is also recommended the County consider promoting the leveraging of strategic investments to maintain and modernize a multimodal freight transportation system with innovative approaches, including advanced technology to optimize

integrated network efficiency, improve travel time reliability, and achieve sustainable congestion reduction.

If you have any other questions, please call Rosy Rajput, Transportation Planner at (559) 614-7289.

Sincerely,



Mr. David Padilla, Branch Chief,
Transportation Planning

C: SCH# 2022080056

Docusign Envelope ID: 34586F70-DA73-4063-BC5F-8E497B2E294B

State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Central Region
1234 East Shaw Avenue
Fresno, CA 93710
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director

August 26, 2024

Katrina Slayton, Division Chief
Kern County Planning and Natural Resources Department
2700 "M" Street, Suite 100
Bakersfield, California 93301
(661) 862-8957
slaytonk@kerncounty.com

Subject: Malibu Vineyards Industrial Parkway Project (Project)
Draft Environmental Impact Report (DEIR)
State Clearinghouse No. 2022080056

Dear Katrina Slayton:

The California Department of Fish and Wildlife (CDFW) received a DEIR from Kern County for the above-referenced Project pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines.[1]

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, CDFW appreciates the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW ROLE

CDFW is California's **Trustee Agency** for fish and wildlife resources and holds those resources in trust by statute for all the people of the State (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a)). CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (*Id.*, § 1802.). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW is also submitting comments as a **Responsible Agency** under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may

[1] CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

Docusign Envelope ID: 34586F70-DA73-4063-BC5F-8E497B2E294B

need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 et seq.). Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), related authorization as provided by the Fish and Game Code will be required.

Nesting Birds: CDFW has jurisdiction over actions with potential to result in the disturbance or destruction of active nest sites or the unauthorized take of birds. Fish and Game Code sections that protect birds, their eggs and nests include, sections 3503 (regarding unlawful take, possession or needless destruction of the nest or eggs of any bird), 3503.5 (regarding the take, possession or destruction of any birds-of-prey or their nests or eggs), and 3513 (regarding unlawful take of any migratory nongame bird).

PROJECT DESCRIPTION SUMMARY

Proponent: Malibu Vineyards, LP

Objective: The Project proposes to convert 739 acres of existing agricultural lands to an industrial park. The Project includes the construction of approximately 8,907,446 square-feet of industrial use space, comprised of 24 buildings. The Project would consist of 24 buildable future parcels with proposed office and warehouse uses with drainage basins on each. Up to 25 percent, approximately 2,196,684 square-feet, would include refrigerated warehouse space. Site improvements, including associated driveways, parking areas, truck courts, landscaping, and retention basins to control surface drainage, are also included as part of the Project.

Location: The Project site is located within unincorporated Kern County, north of Imperial Avenue, immediately east of State Route 99, east of the City of Shafter, and approximately 1.5 miles north of the City of Bakersfield. The Assessor's Parcel Numbers (APNs) associated with the Project site are: 482-010-01, 482-010-03, 482-040-01, 482-040-03, 482-010-02, 482-010-11, 482-040-02, 091-150-03, 091-160-03, 091-160-16, 091-200-07, 091-160-01, 091-160-09, 091-200-04, 091-200-14, 091-160-02, 091-160-13, 091-200-05, 091-200-13, 482-040-04, and 482-040-05.

Timeframe: Uncertain but initial grading is anticipated to begin in 2025.

COMMENTS AND RECOMMENDATIONS

CDFW offers the following comments and recommendations to assist Kern County in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources.

Docusign Envelope ID: 34586F70-DA73-4063-BC5F-8E497B2E294B

Editorial comments or other suggestions may also be included to improve the CEQA document prepared for this Project.

Aerial imagery of the Project boundary and its surroundings show the area contains agricultural lands including orchards and routinely disked row crops. Based on a review of the Project description, California Natural Diversity Database (CNDDB) records, and the surrounding habitat, several special-status species could potentially be impacted by Project activities.

Currently, the DEIR acknowledges that the Project area is within the geographic range of several special-status animal species and proposes specific mitigation measures to reduce impacts to less than significant. CDFW has concerns about the ability of some of the proposed mitigation measures to reduce impacts to less than significant and avoid unauthorized take for several special-status animal species, including the State threatened and federally endangered San Joaquin kit fox (*Vulpes macrotis mutica*), the State threatened Swainson's hawk (*Buteo swainsoni*), and the State species of special concern burrowing owl (*Athene cunicularia*).

COMMENT 1: San Joaquin kit fox

The DEIR notes that San Joaquin kit fox (SJKF) has the potential to occur on the proposed Project site and Mitigation Measures MM 4.4-3 and 4.4.-4 are provided to mitigate for impacts to SJKF. Mitigation Measure 4.4-4 on page 4.4-33, states that "No more than (30) days prior to the issuance of any grading or building permits or the start of ground disturbance, a qualified biologist knowledgeable in the identification of all special-status wildlife species shall conduct a pre-construction survey of areas proposed for disturbance within the project site and 500-foot buffer (where legally accessible) to determine if any special-status species are present. If, as a result of this pre-construction survey it is determined that special-status wildlife species are present, the project proponent shall confer with the U.S. Fish and Wildlife Service or California Department of Fish and Wildlife, as required by applicable law, for proper avoidance measures or the need for take authorization through the acquisition of an incidental take permit, pursuant to Fish and Game Code section 2081 subdivision (d)." CDFW concurs with conducting surveys for SJKF and recommends that these surveys be conducted prior to the issuance of any grading or building permits or the start of ground disturbance. In addition, CDFW recommends the following:

> **Recommended Mitigation Measure 1: SJKF Avoidance Buffer**
> CDFW recommends implementing no-disturbance buffers, as described in the USFWS' "Standardized Recommendations for Protection of the San Joaquin Kit Fox Prior to or During Ground Disturbance" (2011) (USFWS Protocol) around potentially suitable or known SJKF den sites.

Docusign Envelope ID: 34586F70-DA73-4063-BC5F-8E497B2E294B

Recommended Mitigation Measure 2: SJKF Take Authorization
If the no-disturbance buffers outlined in the USFWS Protocol for SJKF is not feasible, CDFW recommends that consultation with CDFW occur to discuss how to implement the Project and avoid take. If take cannot be avoided, CDFW recommends the Project proponent pursue take authorization through the acquisition of an Incidental Take Permit (ITP), pursuant to Fish and Game Code section 2081 subdivision (b) to comply with CESA.

COMMENT 2: Swainson's Hawk

The DEIR notes that Swainson's hawk (SWHA) has the potential to occur on the proposed Project site and states that, "The potential for occurrence is moderate due to the presence of suitable foraging habitat within the fallow fields and known occurrences within the San Joaquin Valley." Mitigation Measures MM 4.4-3 and 4.4.-4 are provided to mitigate for impacts to SWHA. Mitigation Measure 4.4-4 on page 4.4-33, states that "No more than (30) days prior to the issuance of any grading or building permits or the start of ground disturbance, a qualified biologist knowledgeable in the identification of all special-status wildlife species shall conduct a pre-construction survey of areas proposed for disturbance within the project site and 500-foot buffer (where legally accessible) to determine if any special-status species are present. If, as a result of this pre-construction survey it is determined that special-status wildlife species are present, the project proponent shall confer with the U.S. Fish and Wildlife Service or California Department of Fish and Wildlife, as required by applicable law, for proper avoidance measures or the need for take authorization through the acquisition of an incidental take permit, pursuant to Fish and Game Code section 2081 subdivision (d)." CDFW concurs with conducting surveys for SWHA and recommends that SWHA protocol-level surveys be conducted consistent with the survey methods developed by the Swainson's Hawk Technical Advisory Committee (SWHA TAC 2000) prior to the issuance of any grading or building permits or the start of ground disturbance. In addition, CDFW recommends the following:

Recommended Mitigation Measure 3: SWHA Avoidance Buffer
If Project-specific activities will take place during the SWHA nesting season (i.e., March 1 through September 15), and active SWHA nests are present, CDFW recommends a minimum ½-mile no-disturbance buffer be delineated and maintained around each nest, regardless of whether it was detected by surveys or observed incidentally. These buffers should remain in place until the breeding season ends or until a qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or parental care for survival, to prevent nest abandonment and other take of SWHA as a result of Project activities.

Docusign Envelope ID: 34586F70-DA73-4063-BC5F-8E497B2E294B

Recommended Mitigation Measure 4: SWHA Take Authorization
CDFW also recommends that in the event an active SWHA nest is detected, and a ½-mile no-disturbance buffer is not feasible, consultation with CDFW is warranted to discuss how to implement the Project and avoid take. If take cannot be avoided, CDFW recommends pursuing an ITP pursuant to Fish and Game Code section 2081 subdivision (b) to prevent inadvertent take of the species in advance of any Project construction.

COMMENT 3: Burrowing Owl

The DEIR notes that burrowing owl (BUOW) has the potential to occur on the proposed Project site and Mitigation Measures MM 4.4-3 and 4.4.-4 are provided to mitigate for impacts to BUOW. Mitigation Measure 4.4-4 on page 4.4-33, states that "No more than (30) days prior to the issuance of any grading or building permits or the start of ground disturbance, a qualified biologist knowledgeable in the identification of all special-status wildlife species shall conduct a pre-construction survey of areas proposed for disturbance within the project site and 500-foot buffer (where legally accessible) to determine if any special-status species are present. If, as a result of this pre-construction survey it is determined that special-status wildlife species are present, the project proponent shall confer with the U.S. Fish and Wildlife Service or California Department of Fish and Wildlife, as required by applicable law, for proper avoidance measures or the need for take authorization through the acquisition of an incidental take permit, pursuant to Fish and Game Code section 2081 subdivision (d)." CDFW concurs with conducting surveys for BUOW and recommends that BUOW protocol-level surveys be conducted by a qualified biologist following CDFW's "Staff Report on Burrowing Owl Mitigation" (CDFG 2012) prior to the issuance of any grading or building permits or the start of ground disturbance. In addition, CDFW recommends the following:

Recommended Mitigation Measure 5: BUOW Avoidance Buffer
Should a BUOW be detected, CDFW recommends that no-disturbance buffers, as outlined in the "Staff Report on Burrowing Owl Mitigation" (CDFG 2012), be implemented prior to and during any ground-disturbing activities. Specifically, CDFW's Staff Report recommends that impacts to occupied burrows be avoided in accordance with the following table unless a qualified biologist approved by CDFW verifies through non-invasive methods that either: 1) the birds have not begun egg laying and incubation; or 2) that juveniles from the occupied burrows are foraging independently and are capable of independent survival.

Docusign Envelope ID: 34586F70-DA73-4063-BC5F-8E497B2E294B

Location	Time of Year	Level of Disturbance		
		Low	Med	High
Nesting sites	April 1-Aug 15	200 m*	500 m	500 m
Nesting sites	Aug 16-Oct 15	200 m	200 m	500 m
Nesting sites	Oct 16-Mar 31	50 m	100 m	500 m

* meters (m)

Recommended Mitigation Measure 6: BUOW Consultation
If BUOW are found within these recommended buffers and avoidance is not possible, consultation with the CDFW is recommended for guidance on the development of mitigation measures such as take avoidance, minimization, and mitigation.

Editorial Comments and/or Suggestions

Federally Listed Species: CDFW recommends consulting with USFWS regarding potential impacts to federally listed species including, but not limited to the, SJKF. Take under the Federal Endangered Species Act (FESA) is more broadly defined than CESA; take under FESA also includes significant habitat modification or degradation that could result in death or injury to a listed species by interfering with essential behavioral patterns such as breeding, foraging, or nesting. Consultation with the USFWS in order to comply with FESA is advised well in advance of any Project activities.

Lake and Streambed Alteration: Project activities that substantially change the bed, bank, and channel of any river, stream, or lake are subject to CDFW's regulatory authority pursuant Fish and Game Code section 1600 et seq. Fish and Game Code section 1602 requires an entity to notify CDFW prior to commencing any activity that may (a) substantially divert or obstruct the natural flow of any river, stream, or lake; (b) substantially change or use any material from the bed, bank, or channel of any river, stream, or lake (including the removal of riparian vegetation): (c) deposit debris, waste or other materials that could pass into any river, stream, or lake. "Any river, stream, or lake" includes those that are ephemeral or intermittent as well as those that are perennial and may include those that are highly modified such as canals and retention basins.

CDFW is required to comply with CEQA in the issuance of a Lake or Streambed Alteration Agreement (LSAA); therefore, if the CEQA document approved for the Project does not adequately describe the Project and its impacts to lakes or streams, a subsequent CEQA analysis may be necessary for LSAA issuance. For information on notification requirements, please refer to CDFW's website (https://wildlife.ca.gov/Conservation/LSA) or contact CDFW staff in the Central Region Lake and Streambed Alteration Program at (559) 243-4593.

Docusign Envelope ID: 34586F70-DA73-4063-BC5F-8E497B2E294B

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database, which may be used to make subsequent or supplemental environmental determinations (Pub. Resources Code, § 21003, subd. (e)). Accordingly, please report any special-status species and natural communities detected during Project surveys to the CNDDB. The CNDDB field survey form can be found at the following link: https://www.wildlife.ca.gov/Data/CNDDB/Submitting-Data. The completed form can be mailed electronically to CNDDB at the following email address: CNDDB@wildlife.ca.gov. The types of information reported to CNDDB can be found at the following link: https://www.wildlife.ca.gov/Data/CNDDB/Plants-and-Animals.

FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying project approval to be operative, vested, and final (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089).

CONCLUSION

CDFW appreciates the opportunity to comment on the DEIR to assist Kern County in identifying and mitigating Project impacts on biological resources.

More information on survey and monitoring protocols for sensitive species can be found at CDFW's website (https://www.wildlife.ca.gov/Conservation/Survey-Protocols). If you have any questions regarding this letter or further coordination, please contact Marile Colindres, Environmental Scientist, at the address provided on this letterhead, by telephone at (559) 974-3452, or by electronic mail at marile.colindres@wildlife.ca.gov.

Sincerely,

DocuSigned by:
Julie Vance
FA83F09FE08945A...

Julie A. Vance
Regional Manager

Docusign Envelope ID: 34586F70-DA73-4063-BC5F-8E497B2E294B

ec: State Clearinghouse
Governor's Office of Planning and Research
State.Clearinghouse@opr.ca.gov

Docusign Envelope ID: 34586F70-DA73-4063-BC5F-8E497B2E294B

REFERENCES

California Department of Fish and Game. 2012. Staff report on burrowing owl mitigation. Sacramento, California, USA.

Swainson's hawk technical advisory committee (SWHA TAC). 2000. Recommended timing and methodology for Swainson's hawk nesting surveys in the central valley of California. Swainson's hawk technical advisory committee. May 31, 2000.

U. S. Fish and Wildlife Service. 2011. Standard Recommendations for the Protection of the San Joaquin Kit Fox Prior to or During Ground Disturbance. U.S. Fish and Wildlife Service, Sacramento Fish and Wildlife Office, Sacramento, California.

Docusign Envelope ID: 34586F70-DA73-4063-BC5F-8E497B2E294B

Attachment 1

CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE
RECOMMENDED MITIGATION MONITORING AND REPORTING PROGRAM (MMRP)

PROJECT: Malibu Vineyards Industrial Parkway
SCH No.: 2022080056

RECOMMENDED MITIGATION MEASURE	**STATUS/DATE/INITIALS**
Before Disturbing Soil or Vegetation	
SJKF	
Recommended Mitigation Measure 2: SJKF take authorization	
SWHA	
Recommended Mitigation Measure 4: SWHA take authorization	
BUOW	
Recommended Mitigation Measure 6: BUOW consultation	
During Construction	
SJKF	
Recommended Mitigation Measure 1: SJKF avoidance buffer	
SWHA	
Recommended Mitigation Measure 3: SWHA avoidance buffer	
BUOW	
Recommended Mitigation Measure 5: BUOW avoidance buffer	

August 27, 2024

Katrina Slayton
Division Chief
Kern County Planning and Natural Resources Department
2700 M Street Suite 100
Bakersfield, California 93301
slaytonk@kerncounty.com

Sent via email

Katrina Slayton:

Thank you for providing the California Air Resources Board (CARB) with the opportunity to comment on the Malibu Vineyards Industrial Parkway Project (Project) Draft Environmental Impact Report (DEIR), State Clearinghouse No. 2022080056. The Project proposes the construction and operation of 24 office and warehouse buildings totaling 8,907,446 square feet. The Project would be built out in two phases. Under Phase 1, 14 office and warehouse buildings would be constructed and be fully operational in 2050. Under Phases 2, 10 office and warehouse buildings would be constructed in and fully operational in 2031. Approximately 2,196,684 square feet of the development would be used as cold storage. Once fully built out, the proposed Project would result in up to 13,575 daily vehicle trips along local roadways, including 3,313 daily truck trips.[1] The Project is proposed within Kern County (County), California, which is the lead agency for California Environmental Quality Act (CEQA) purposes.

CARB is concerned that the Project will expose nearby residential communities to elevated levels of air pollution beyond the existing baseline emissions at the Project site. Residences are located to the east and south of the Project site, with the closest residence located within 1,100 feet south of the Project site. These residences are located near existing toxic diesel particulate matter (diesel PM) emission sources, which include existing industrial facilities, aircraft traffic from the Meadows Field Airport, rail traffic along existing rail lines, and vehicular traffic along State Route 99.

The State of California has placed additional emphasis on protecting local communities from the harmful effects of air pollution through the passage of Assembly Bill 617 (AB 617) (Garcia, Chapter 136, Statutes of 2017). AB 617 is a significant piece of air quality legislation that highlights the need for further emission reductions in communities with high exposure

[1] Kern County. Malibu Vineyards Industrial Parkway Project Draft Environmental Impact Report. Appendix L. Page 14. Table 1. Page 4.3-32. Accessible at *https://files.ceqanet.opr.ca.gov/280550-2/attachment/Y7fkMs1OvTzJpcVDOsUqXuAkfijcQGnsxozf4QyCAZZTZW4Nmf9obia_qQr9kI5hJth_mJqtKCNN-GtA0*

burdens, like those in which the Project is located. Diesel PM emissions generated during the construction and operation of the Project would negatively impact neighboring communities.

Through its authority under Health and Safety Code section 39711, the California Environmental Protection Agency (CalEPA) is charged with the duty to identify disadvantaged communities. CalEPA bases its identification of these communities on geographic, socioeconomic, public health, and environmental hazard criteria (Health and Safety Code, section 39711, subsection (a)); In this capacity, CalEPA currently defines a disadvantaged community, from an environmental hazard and socioeconomic standpoint, as a community that scores within the top 25% of the census tracts as analyzed by the California Communities Environmental Health Screening Tool Version 4.0 (CalEnviroScreen). CalEnviroScreen uses a screening methodology to help identify California communities currently disproportionately burdened by multiple sources of pollution. The census tract containing the Project is within the top 13% for Pollution Burden and is considered a disadvantaged community. The County must ensure that the Project does not adversely impact neighboring disadvantaged communities.

Industrial facilities, like the facilities described in the Project, can result in high volumes of heavy-duty diesel truck traffic, and operation of on-site equipment (e.g., forklifts and yard tractors) that emit toxic diesel emissions, and contribute to regional air pollution and global climate change.[2] To better address regional air pollution and global climate change, Governor Gavin Newsom signed Executive Order N-79-20 on September 23, 2020. The Executive Order states: "It shall be a goal of the State that 100% of in-state sales of new passenger cars and trucks will be zero-emission by 2035. It shall be a further goal of the State that 100% of medium and heavy-duty vehicles in the State be zero-emission by 2045 for all operations where feasible and by 2035 for drayage trucks. It shall be further a goal of the State to transition to 100% zero-emission off-road vehicles and equipment by 2035 where feasible." The Executive Order further directs the development of regulations to help meet these goals. To ensure that lead agencies, like the County, stay in step with evolving scientific knowledge to protect public health from adverse air quality and greenhouse gas impacts from the transportation sector, which serves as the basis of the Governor's Executive Order N-79-20, CARB staff urges the County to plan for the use of zero-emission technologies within the Project area as described in this letter.

[2] With regard to greenhouse gas emissions from this project, CARB has been clear that local governments and project proponents have a responsibility to properly mitigate these impacts. CARB's guidance, set out in detail in the Scoping Plan issued in 2022, explains that in CARB's expert view, local mitigation is critical to achieving climate goals and reducing greenhouse gases below levels of significance. CARB's 2022 Scoping Plan for Achieving Carbon Neutrality, published November 16, 2022, is available at *https://ww2.arb.ca.gov/sites/default/files/2022-12/2022-sp_1.pdf*

The DEIR Does Not Analyze Potential Air Quality Impacts from the Project's Transport Refrigeration Units

Section 3.7 (Project Characteristics) of the DEIR states that up to 25% of the proposed 8,907,446 square foot warehouse development would be used for cold storage.[3] Since the County would allow cold storage uses within the Project site, trucks and trailers visiting the Project site would be equipped with Transport Refrigeration units (TRU).[4] TRUs on trucks and trailers can emit large quantities of diesel exhaust while operating within the Project site. Residences and other sensitive receptors (e.g., daycare facilities, senior care facilities, and schools) located near where these TRUs could be operating, would be exposed to diesel emissions that would result in a significant air quality impact. However, based on CARB's review of Appendix D (Air Quality Impact Analysis), the County did not model and report air pollutant emissions from TRUs in the DEIR. The air pollutant emission estimates presented in the DEIR were modeled using the California Emissions Estimator Model (CalEEMod). Although CalEEMod can estimate air pollutant emissions from area, energy, and mobile sources, the current version of CalEEMod does not account for air pollutant emissions from TRUs. Since a portion of the Project could be used for cold storage, CARB urges the County to model and report the Project's air pollution emissions from the operation of on and off site TRUs using CARB's latest emission factors. The County should assume that a percentage of the Project's truck fleet is equipped with TRUs and should estimate the idling duration for each TRU; assumptions should be supported by substantial evidence and estimates of TRU percentage and idling time should be conservative from a health protection standpoint.

The DEIR Used Incorrect Trip Lengths When Modeling the Project's Air Quality Impacts from Mobile Sources

The County underestimated the Project's mobile source air pollutant emissions in the DEIR by relying on unrealistic truck trip lengths. According to the air quality analysis presented in Appendix D (Air Quality Impact Analysis) of the DEIR, the Project's mobile air quality impacts were modeled assuming heavy-duty trucks would travel a distance of 50 miles under Phases 1 and 2.[5] However, based on CARB's review of the CalEEMod input files, used to model the

---

[3] Kern County. Malibu Vineyards Industrial Parkway Project Draft Environmental Impact Report. Page 3-22. Accessible at *https://files.ceqanet.opr.ca.gov/280550-2/attachment/MBq4c5ltYUVTH7zJAI7vXkCeQZmVbRtR-7Jf7eXQsC3I_WlJScxacGZdixn0PGY04QLiTFCmH8L-Znfn0*

[4] TRUs are refrigeration systems, these systems may be powered by integral diesel engines; TRUs protect perishable goods during transport in an insulated truck and trailer vans, rail cars, and domestic shipping containers.

[5] Kern County. Malibu Vineyards Industrial Parkway Project Draft Environmental Impact Report. Appendix D. Page 4.4. Accessible at *https://files.ceqanet.opr.ca.gov/280550-2/attachment/Y7fkMs1OvTzJpcVDOsUqXuAkfijcQGnsxozf4QyCAZZTZW4Nmf9obia_qQr9kI5hJth_mJqtKCNN-GtA0*

Project's air quality it impacts, the trip distance for heavy-duty trucks under Phase 2 was entered as zero; this was likely due to a user input error. Due to this error, the mobile air quality impacts associated with the operation of Phase 2 were substantially underestimated in the DEIR. The County must remodel the Project's Phase 2 operational air quality impacts using the assumed 50 mile trip distance and report the results in the Final Environmental Impact Report (FEIR).

The DEIR Did Not Fully Account for Air Pollutant Emissions from Heavy Duty Trucks During On Site Grading

Section 3.7 (Project Characteristics) of the DEIR indicates the construction of the Project would require onsite grading, and the cut and fill quantities for the grading of the Project site would be specified in a future grading plan.[6] Based on CARB's review of the CalEEMod input files provided in Appendix D (Air Quality Analysis) of the DEIR, the County did not model heavy-duty truck trips associated with the import and export of soil during onsite grading. To fully understand the Project's potential air quality impacts associated with its construction, the County must remodel the Project's construction air pollutant emissions using onsite grading assuming heavy-duty truck trips and trip distances supported by substantial evidence and report the findings in the FEIR.

The County Used Inappropriate Assumptions When Modeling the Project's Health Risk Impacts

The Health Risk Analysis (HRA) prepared for the Project and presented in Section 4.3 (Air Quality) of the DEIR concluded that residences near the Project site would be exposed to diesel PM emissions that would result in cancer risks of 0.01 chances per million during Project operations. Since the Project's cancer risks were below the San Juaquin Valley Air Pollution Control District's (SJVAPCD) significance threshold of 20 chances per million, the DEIR concluded that the Project would have a less than significant impact on public health.

The County may have underestimated the Project's health risk impacts by assuming an idling duration for onsite heavy-duty trucks that is not supported by substantial evidence. The County assumed an idling duration of 15 minutes for onsite heavy-duty trucks when evaluating the Project's health risk impacts.[7] CARB's Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling (ATCM) restricts trucks from idling

---

[6] Kern County. Malibu Vineyards Industrial Parkway Project Draft Environmental Impact Report Page 3-55. Accessible at *https://files.ceqanet.opr.ca.gov/280550-2/attachment/Y7fkMs1OvTzJpcVDOsUqXuAkfijcQGnsxozf4QyCAZZTZW4Nmf9obia_qQr9kI5hJth_mJqtKCNN-GtA0*

[7] Kern County. Malibu Vineyards Industrial Parkway Project Draft Environmental Impact Report. Appendix D. Accessible at *https://files.ceqanet.opr.ca.gov/280550-2/attachment/Y7fkMs1OvTzJpcVDOsUqXuAkfijcQGnsxozf4QyCAZZTZW4Nmf9obia_qQr9kI5hJth_mJqtKCNN-GtA0*

longer than five minutes. However, the ATCM has an exemption for trucks equipped with a diesel engine meeting the optional nitrogen oxides (NOx) idling emissions standard when operating outside of 100 feet of a restricted area (e.g., residences, schools).[8] Because trucks starting with model year 2008+, are clean-idle certified, many of the trucks operating within the Project site could idle longer than five minutes. According to Table 4.4.2-5 of the EMFAC2021 Volume III Technical Document, heavy-duty trucks can idle for as long as approximately five hours in any one location.[9] To fully evaluate the Project's potential health risk impacts, the County must either add a project design feature in the DEIR restricting heavy-duty truck idling within the Project site to less than 15 minutes or revise the Project's HRA to assume a heavy-duty truck idling duration supported by substantial evidence.

The HRA assumed 5% of the trucks and trailers with TRUs idling within the Project site would be equipped with TRUs, which is inconsistent with the Project's description.[10] According to Section 3.7 (Project Characteristics) of the DEIR, up to 25% of the proposed 8,907,446 square foot warehouse development would be used for cold storage.[11] Since 25% of the proposed industrial development would be used for cold storage, the County should either remodel the Project's health risk impacts assuming 25% of the trucks and trailers serving the Project site would be equipped with TRUs or provide substantial evidence in the FEIR supporting the County's assumption that only 5% of the trucks and trailers would be equipped with TRUs.

It is unclear in the HRA whether the County modeled cancer risks from TRUs. The HRA provides assumptions used to model the Project's health risk impacts from the operation of heavy-duty trucks serving the Project; however, the HRA does not provide any assumptions used to model health risk impacts from TRUs operating within the Project site and traveling along local roadways. The HRA does not provide the assumed idling time or exhaust emissions factors for TRUs, the number of TRU trips traveling along local roadways, and other assumptions required to model health risks from TRUs. To this end, the FEIR should include all assumptions used to model health risk impacts from TRUs. Furthermore, the HRA must provide a figure showing the truck routes used to model the Project's health risk impacts.

---

[8] CARB. Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling. Accessible at *https://ww2.arb.ca.gov/sites/default/files/2022-06/13_CCR_2485_OAL_06222022-2_ADA_06272022_0.pdf*

[9] CARB. EMFAC2021 Volume III Technical Document. Page 161. Table 4.4.2-5. Accessible at *https://ww2.arb.ca.gov/sites/default/files/2021-03/emfac2021_volume_3_technical_document.pdf*

[10] Kern County. Malibu Vineyards Industrial Parkway Project Draft Environmental Impact Report. Appendix D. Accessible at *https://files.ceqanet.opr.ca.gov/280550-2/attachment/Y7fkMs1OvTzJpcVDOsUqXuAkfijcQGnsxozf4QyCAZZTZW4Nmf9obia_qQr9kI5hJth_mJqtKCNN-GtA0*

[11] Kern County. Malibu Vineyards Industrial Parkway Project Draft Environmental Impact Report. Page 3-22. Accessible at *https://files.ceqanet.opr.ca.gov/280550-2/attachment/MBq4c5ltYUVTH7zJAl7vXkCeQZmVbRtR-7Jf7eXQsC3I_WlJScxacGZdixn0PGY04QLiTFCmH8L-Znfn0*

The County generated the heavy-duty truck emission factors using CARB's EMFAC model, which was used to estimate the Project health risk impacts from heavy-duty trucks serving the Project. The County did not include the EMFAC outputs in the HRA. Consequently, CARB staff could not confirm the mobile emission factors used to estimate the Project's health risk impacts. When generating the Project's mobile emission factors, the County assumed the Project would be fully operational in the year 2050. However, according to the Project's description, the Project would be built out in two phases. Phase 1 would be operational in 2050, and Phase 2 would be operational in 2031. Due to many of CARB's regulations, such as the Advanced Clean Trucks Regulation, the mobile emission factors for heavy-duty trucks will be much higher in the year 2031 than in the year 2050. Since the operation of Phase 2 would be built earlier than 2050, the County should remodel the health risk impacts associated with the operation of the warehouse developments using the emission factors for the specific periods modelled, therefore, under Phase 1 using a heavy-duty truck emission factors extending from the year 2050 and Phase 2 using a heavy-duty truck emission factor for the years modelled extending from the year 2031. Furthermore, since Phase 2 would be operational while Phase 1 is still under construction, the HRA should also account for health risk impacts associated with the overlap of construction and operation of the Project.

The County Must Provide More Meaningful Mitigation Measures to Reduce the Project's Impact on Air Quality

The County concluded in Section 4.3 (Air Quality) of the DEIR that the operation of the Project would result in a significant impact on air quality. According to Table 4.3-5 (Post Project Operational Emissions), the operation of the full buildout of the Project would emit as much as 11 pounds per day of volatile organic compounds (VOC), 59 pounds per day of nitrogen oxides (NOx), and 40 pounds per day of particulate matter less than 10 micrometers (PM10), which was found to exceed the SJVAPCD's significance threshold and would result in a significant impact on air quality. To mitigate the Project's operational air quality impacts, the DEIR included 10 mitigation measures (MM 4.3-1 through MM 4.3-10). These mitigation measures would require all equipment to be powered by Tier 3 engines when available. Specifically, MM 4.3-4 would require Owners/Operators of industrial buildings to enter into a Developer Mitigation Measure (DMA), similar to the SJVAPCD's Voluntary Emissions Reduction Agreement (VERA), with the SJVAPCD. The DMA would require the Owners/Operators to pay fees to fully mitigate the Project's construction and operational air quality impacts. After the implementation of these mitigation measures, the County concluded in the DEIR that the Project's air quality impact would be reduced to less than significant after mitigation under CEQA.

The Project could be used for cold storage, which would result in trucks and trailers with TRUs serving the proposed warehouse development. As previously discussed, trucks and trailers with TRUs would expose the nearby community to a substantial amount of diesel PM that would lead to potential cancer risk impacts. To fully mitigate these potential health risk

impacts, CARB urges the County to include one of the following design measures in the DEIR:

- A Project design measure requiring contractual language in tenant lease agreements that prohibits tenants from operating diesel-powered TRUs within the Project site; or
- A condition requiring a restrictive covenant over the parcel that prohibits the applicant's use of diesel-powered TRUs on the property unless the applicant seeks and receives an amendment to its conditional use permit allowing such use.

MM 4.3-3 would require all equipment used during the construction of the Project to be powered by Tier 3 engines, when available. To mitigate the Project's potential air quality impacts associated with project construction, CARB urges the County to include a project design feature or mitigation measure in the FEIR that would require all off-road equipment used during project construction be equipped with Tier 4 Final engines and reduce the idling time for all heavy-duty trucks and off-road equipment to five minutes.

MM 4.3-4 would require Owners/Operators of industrial buildings within the Project site to enter into a DMA with the SJVAPCD. The DMA would require the Owners/Operators to pay fees to avoid any net increase in the emissions of NOx, ROG, PM10, and particulate matter less than 2.5 micrometers (PM2.5). Due to this mitigation measure, the County concluded that the operation of the Project would result in a net zero emission rate for these criteria pollutants. The County should not solely rely on offsite mitigation fees to reduce the Project's impact on air quality. To fully mitigate the Project's air quality and health risk impacts, CARB urges the County to include a Project design feature or mitigation measure in the FEIR that would require all heavy-duty trucks serving the Project during its operation to be zero-emission. As presented below, CARB has many regulations that promote and eventually require the use of zero-emission trucks at freight facilities, such as the proposed Project. Specifically, the Advanced Clean Fleet Regulation would require all drayage trucks in California to be zero-emission by 2035. To support trucks serving the Project, that are already complying with the Advanced Clean Fleets regulation, CARB urges the County to require the infrastructure to support on-site zero-emission trucks at the start of Project operations.

A list of commercially-available zero-emission trucks can be obtained from the Hybrid and Zero-emission Truck and Bus Voucher Incentive Project (HVIP).[12] The HVIP is a part of California Climate Investments to incentivize the purchase of zero-emission trucks. Based on CARB's review of the zero-emission trucks listed in the HVIP, there are commercially available electric trucks that can meet the cargo transportation needs of individual industrial uses proposed in the County today. CARB has implemented or is developing regulations that will require the use of zero-emission trucks.

[12] Zero-Emission Truck and Bus Voucher Incentive Project. Accessible at: *https://californiahvip.org/*

The list below details the CARB regulations that will result in the reduction of diesel PM and NOx emissions from trucks within California:

- **Drayage Truck Regulation:** The existing Drayage Truck Regulation requires all drayage trucks to operate with an engine that is a 2007 model year or newer.
- **Truck and Bus Regulation:** The Truck and Bus Regulation requires all trucks, including drayage, to have 2010 or newer model year engines by January 1, 2023.
- **Heavy-Duty Low-NOx Omnibus Rule:** The Heavy-Duty Low-NOx Omnibus Rule requires truck emission standards to be reduced from 0.20 to 0.05 grams per brake horsepower-hour (g/bhp-hr) from 2024 to 2026, and to 0.02 g/bhp-hr in 2027.
- **Advanced Clean Trucks Regulation:** The Advanced Clean Trucks Regulation, approved by CARB on June 25, 2020, requires manufacturers to start the transition from diesel trucks and vans to zero-emission trucks beginning in 2024. The rule is expected to result in about 100,000 zero-emission trucks in California by the end of 2030 and about 300,000 by 2035. The Advanced Clean Trucks regulation is part of CARB's overall approach to accelerate a large-scale transition to zero-emission medium-and heavy-duty vehicles. CARB approved amendments to the Advanced Clean Trucks regulation in March 2021; the amendments help ensure that more zero-emission vehicles are brought to market. CARB directed staff to ensure that fleets, businesses, and public entities that own or direct the operation of medium- and heavy-duty vehicles in California purchase and operate ZEVs to achieve a smooth transition to ZEV fleets by 2045 everywhere feasible, and specifically to reach:
    - 100% zero-emission drayage trucks, last mile delivery, and government fleets by 2035
    - 100% zero-emission refuse trucks and local buses by 2040
    - 100% zero-emission capable utility fleets by 2040
- **Advanced Clean Fleets Regulation:** The Advanced Clean Fleets Regulation is part of CARB's overall strategy to accelerate a large-scale transition to zero-emission medium- and heavy-duty vehicles. This regulation works in conjunction with the Advanced Clean Trucks regulation. The regulation applies to trucks performing drayage operations at seaports and railyards, fleets owned by State, local, and federal government agencies, and high priority fleets. High priority fleets are those entities that own, operate, or direct at least one vehicle in California, and that have either $50 million or more in gross annual revenue, or that own, operate, or have common ownership or control of a total of 50 or more vehicles. The regulation affects medium- and heavy-duty on-road vehicles with a gross vehicle weight rating greater than 8,500 pounds, off-road yard tractors, and light-duty mail and package delivery vehicles. All drayage trucks entering seaports and intermodal railyards would be required to be zero-emission by 2035.

With the implementation of the regulations listed above, specifically the Advanced Clean Trucks Regulation, tenants at the proposed industrial/warehouse development must begin the transition from diesel trucks and vans to zero-emission trucks. To help mitigate the Project's impact on air quality and public health, CARB urges the County to include contractual language in tenant lease agreements requiring future tenants to use zero-emission trucks during their operation in the FEIR.

Conclusion

CARB is concerned about the Project's air quality and public health impacts. To fully assess the Project's impact on neighboring communities, the County must evaluate the potential air quality and health risk impacts associated with trucks and trailers with TRUs visiting the Project site. When modeling the Project's air quality impacts, the County should assume consistent heavy-duty truck trip distances for the Project's Phase 1 and 2 operations and account for potential impacts associated with onsite grading. The assumed 15-minute idling duration used to estimate the Project's health risk impacts in the HRA should be supported by substantial evidence. The County must account for health risks associated with the overlap of construction and operation of the Project. Lastly, the County should include a mitigation measure requiring all TRUs and heavy-duty trucks serving the Project to be zero emission, and offroad equipment to be equipped with Tier 4 Final engines and not idle longer than five minutes.

CARB appreciates the opportunity to comment on the DEIR for the Project. Given the breadth and scope of projects subject to CEQA review throughout California that have air quality and greenhouse gas impacts, coupled with CARB's limited staff resources to substantively respond to all issues associated with a project, CARB must prioritize its substantive comments here based on staff time, resources, and its assessment of impacts. CARB's deliberate decision to substantively comment on some issues does not constitute an admission or concession that it substantively agrees with the lead agency's findings and conclusions on any issues on which CARB does not substantively submit comments.

CARB staff can provide assistance with zero-emission technologies and emission reduction strategies, as needed. Please include CARB on your list of selected State agencies that will receive the FEIR. If you have questions, please contact Stanley Armstrong, Air Pollution Specialist via email at *stanley.armstrong@arb.ca.gov*.

Sincerely,



Matthew O'Donnell, Chief, Risk Reduction Branch

cc: see next page.

cc: State Clearinghouse
state.clearinghouse@opr.ca.gov

Yassi Kavezade, Organizer, Sierra Club
yassi.kavezade@sierraclub.org

Patia Siong, Supervising Air Quality Specialist, San Joaquin Valley Air Pollution Control District
patia.siong@valleyair.org

Morgan Capilla, NEPA Reviewer, U.S. Environmental Protection Agency, Air Division, Region 9
capilla.morgan@epa.gov

Stanley Armstrong, Air Pollution Specialist, Risk Reduction Branch

Docusign Envelope ID: F0F14768-3DD8-44E9-AC7C-BBE483FFC5E3

California
Department of Conservation
Geologic Energy Management Division

Gavin Newsom, Governor
David Shabazian, Director
715 P Street, MS 1803
Sacramento, CA. 95814
T: (916) 445-5986

09/03/2024

Katrina Slayton
2700 M Street, Bakersfield, CA 93301, USA
SlaytonK@kerncounty.com

Construction Site Well Review (CSWR) ID: 1013073

Assessor Parcel Number(s): 48201001, 48201002, 48201003, 48201011, 48204001, 48204002, 48204003, 09115003, 09116001, 09116002, 09116003, 09116009, 09116013, 09116016, 09120004, 09120005, 09120007, 09120014, 09120013, 48204004, 48204005

Property Owner(s): Malibu Vineyards

Project Location Address: North of Imperial Avenue, east of SR 99 approximately 1.5 miles north of the city of Bakersfield, California 93308

Project Title: Malibu Vineyards Industrial Parkway

Public Resources Code (PRC) § 3208.1 establishes well reabandonment responsibility when a previously plugged and abandoned well will be impacted by planned property development or construction activities. Local permitting agencies, property owners, and/or developers should be aware of, and fully understand, that significant and potentially dangerous issues may be associated with development near oil, gas, and geothermal wells.

The California Geologic Energy Management Division (CalGEM) has received and reviewed the above referenced project dated 8/15/2024. To assist local permitting agencies, property owners, and developers in making wise land use decisions regarding potential development near oil, gas, or geothermal wells, the Division provides the following well evaluation.

The project is located in Kern County, within the boundaries of the following fields:

N/A

Our records indicate there are no known oil or gas wells located within the project boundary as

Docusign Envelope ID: F0F14768-3DD8-44E9-AC7C-BBE483FFC5E3

identified in the application.

- Number of wells Not Abandoned to Current Division Requirements as Prescribed by Law and Projected to Be Built Over or Have Future Access Impeded by this project: 0

- Number of wells Not Abandoned to Current Division Requirements as Prescribed by Law and Not Projected to Be Built Over or Have Future Access Impeded by this project: 0

- Number of wells Abandoned to Current Division Requirements as Prescribed by Law and Projected to Be Built Over or Have Future Access Impeded by this project: 0

- Number of wells Abandoned to Current Division Requirements as Prescribed by Law and Not Projected to Be Built Over or Have Future Access Impeded by this project: 0

As indicated in PRC § 3106, the Division has statutory authority over the drilling, operation, maintenance, and abandonment of oil, gas, and geothermal wells, and attendant facilities, to prevent, as far as possible, damage to life, health, property, and natural resources; damage to underground oil, gas, and geothermal deposits; and damage to underground and surface waters suitable for irrigation or domestic purposes. In addition to the Division's authority to order work on wells pursuant to PRC §§ 3208.1 and 3224, it has authority to issue civil and criminal penalties under PRC §§ 3236, 3236.5, and 3359 for violations within the Division's jurisdictional authority. The Division does not regulate grading, excavations, or other land use issues.

If during development activities, any wells are encountered that were not part of this review, the property owner is expected to immediately notify the Division's construction site well review engineer in the Inland district office, and file for Division review an amended site plan with well casing diagrams. The District office will send a follow-up well evaluation letter to the property owner and local permitting agency.

Should you have any questions, please contact me at (661) 440-3439 or via email at Sade.Haake@conservation.ca.gov.

Sincerely, Olu Oladimeji for Chris Jones Olu Oladimeji

Chris Jones
District Deputy

cc: Katrina Slayton - Submitter

KCSOS
Kern County Superintendent of Schools
Office of John G. Mendiburu, Ed.D. — Advocates For Children

July 26, 2024

Kern County Planning Department
Attn: Katrina Slayton, Division Chief
2700 M Street, Suite 100
Bakersfield, CA 93301

Our File No.: CO24-0093

RE: DEVELOPER FEES FOR: Draft Environmental Impact Report; Malibu Vineyards Industrial Parkway Project; Map No. 80-24, 25 & 81:29, 30
(North of Imperial Ave. and east of SR 99.)

Dear Ms. Slayton,

This office represents the Richland Elementary and Kern High School Districts with regard to the imposition of school facility fees and appreciates the opportunity to respond on behalf of the districts regarding the proposed project. This letter is limited to addressing the possible effects which the project might have on school facilities created by students attributable to the project. It is not intended to address other possible environmental concerns which might be identified by the district(s) after reviewing it.

It is our determination that the above-mentioned Notice of Public Review of a Draft Environmental Impact Report for the Malibu Vineyards Industrial Parkway Project proposing a 8,907,446-sqquare foot industrial park comprised of 24 warehouse and distribution buildings and related improvements on a proposed 739-acre project site may have significant effects on either of these district's facilities and mitigation of this project's impacts on public school facilities will be limited to the collection of statutory fees authorized under Education Code Section 17620 and Government Code Sections 65995 et seq. (all as amended with an operative date of November 4, 1998) at the time that building permits are issued. Currently, these fees are set at $0.84 per square foot, an amount subject to COLA adjustment every two years.

Thank you for the opportunity to comment on the project. Should you have any questions, or if we can be of any further assistance in this matter, please contact me at 636-4599, or through e-mail at anwatson@kern.org.

Sincerely,

Andrea Watson, Specialist
School District Facility Services

RECEIVED
JUL 31 2024
Kern County Planning & Natural Resources Dept.

Cc: Districts

Office Memorandum

To: Lorelei Oviatt, Director
Planning and Natural Resources Department
Attn: Katrina Slayton, Division Chief

August 7, 2024

From: Cesar Ayon, Engineering Manager CA
Public Works Department/Development

Subject: 7-8.3.b Malibu Vineyards Industrial Parkway, EIR

Development Review Division

This Division has reviewed the subject project and has no comment.

Thank you for the opportunity to comment on this project. If you have any questions or comments, please contact Rodd Parke of this Division at (661) 862-8848.

Floodplain Management Division

This Division has reviewed the subject project and has the following comments:

> The runoff of storm water from the site will be increased due to the increase in impervious surface generated by the proposed development.

Therefore, this section recommends the following be included as Conditions of Approval for this project:

> The applicant shall provide a plan for the disposal of drainage waters originating on site and from adjacent road right-of-ways (if required), subject to approval of the Public Works Department, per the Kern County Development Standards.

Thank you for the opportunity to comment on this project. If you have any questions or comments, please contact Brian Blaise of this Division at (661) 862-5098.

Sewer and Water Division

This Division has reviewed the subject project and has the following comments:

(a) A Will-Serve Letter from the sewer district shall be provided to County staff.
(b) Sewer must be connected to a regional wastewater treatment plant.

Thank you for the opportunity to comment on this project. If you have any questions or comments, please contact Kyle Perez of this Division at (661) 862-8852.

CSA Division

This Division has reviewed the subject project and has no comment.

Thank you for the opportunity to comment on this project. If you have any questions or comments, please contact Miguel Munoz of this Division at (661) 862-8908.

August 9, 2024

To: Lorelei Oviatt, Director
Planning and Natural Resources Department
Katrina Slayton, Planning Division Chief

From: Jeremy M. Brock, County Surveyor
By: Andres Arias, Engineering Support Supervisor Phone: 28959

Subject: Draft Environmental Impact Report for the Malibu Vineyards Industries Parkway Project by Malibu Vineyards, LP (PP21116).

I have reviewed the above noted Draft of EIR and recommend the following conditions be placed on the Conditional Use Permits:

1. Prior to issuance of a building or grading permit: All survey monuments shall be tied out by a Licensed Land Surveyor. A corner record for each monument or record of survey shall be submitted to the County Surveyor for review and processing, per Section 8771 of the Professional Land Surveyor's (PLS) Act.

2. Prior to Final Inspection: All survey monuments that were destroyed during construction shall be re-set or have a suitable witness corner set. A post construction corner record for each monument re-set or a record of survey shall be submitted to the County Surveyor for processing, per Section 8771 of the Professional Land Surveyor's Act.

3. Upon completion of project: All survey monuments shall be accessible by a Licensed Land Surveyor or their representatives, with prior notice, per Section 8774 of the PLS Act and Civil Code 846.5 (a).

Thank you for the opportunity to review and comment on this project. Should you have any questions please contact me.

Office Memorandum - Kern County

TO: [Distribution List] **PLEASE SIGN AND DATE BELOW AS SOON AS RECEIVED AND RETURN TO PLANNING & NATURAL RESOURCES DEPARTMENT BEFORE AUGUST 29, 2024**

FROM: LORELEI H. OVIATT, DIRECTOR
Planning & Natural Resources Department

DATE: July 15, 2024

By: Katrina Slayton, Planning Division Chief (862-8957)

SUBJECT: DRAFT ENVIRONMENTAL IMPACT REPORT – Malibu Vineyards Industrial Parkway Project by Malibu Vineyards, LP (PP21116)

Enclosed is a Notice of Availability with a web link to the Draft Environmental Impact Report for the **Malibu Vineyards Industrial Parkway Project by Malibu Vineyards, LP (PP21116).** The Kern County Planning and Natural Resources Department as Lead Agency (per CEQA Guidelines Section 15050) solicits the views of your agency as to the scope and content of the environmental information, which is germane to your agency's statutory responsibilities in connection with the proposed project.

In order to verify that this document was received by your department, **please date and sign this memo** and return by office mail to the Planning and Natural Resources Department, Attn: Katrina Slayton. Thank you in advance for your cooperation.

Distribution List (Kern County):

Agriculture Department
Airports Department
CAO
Public Works Department – Building & Development/Floodplain
Public Works Department - Building & Development/Survey
Public Works Department – Building & Development/Development Review
Public Works Department - Building & Development/Operations & Maintenance/Regulatory Monitoring
Environmental Health Services Department
Fire Department
Library/Beale – Local History Room
Library/Beale – Anide Sullivan
Sherriff Department

RECEIVED: July 17 **By:** Jeremy Brock **Dept.:** Public Works / Survey

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

August 30, 2024

Katrina Slayton
County of Kern
Planning and Natural Resources Department
2700 “M” Street, Suite 100
Bakersfield, CA 93301

Project: Draft Environmental Impact Report – Malibu Vineyards Industrial Parkway Project (PP21116)

District CEQA Reference No: 20240824

Dear Ms. Slayton:

The San Joaquin Valley Air Pollution Control District (District) has reviewed the Draft Environmental Impact Report (DEIR) for the development of an industrial park with approximately 8,907,446 square feet of industrial warehouse and office use space on approximately 739 acres (Project). The Project is located north of Imperial Avenue and east of State Route 99, with site access from Saco Road and Imperial Avenue, in Kern County.

The District offers the following comments at this time regarding the Project:

1) Project Operational Emissions

In Appendix D (Air Quality Impact Analysis) of the DEIR, the CalEEMod analysis for Phase 1 and Phase 2 includes a 50-mile trip length assumption for quantifying air quality emissions for Heavy Heavy-Duty (HHD) trucks. However for Phase 2, it appears this 50-mile trip length was not included in the CalEEMod analysis. The absence of the specified 50-mile trip length in the analysis may underestimate the Project’s air quality emission impacts, particularly with regard to HHD truck trips during operations. Therefore, the District recommends the emissions analysis in the DEIR be revised to correct this omission.

Samir Sheikh
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: (661) 392-5500 FAX: (661) 392-5585

www.valleyair.org www.healthyairliving.com

Printed on recycled paper.

2) Industrial/Warehouse Emission Reduction Strategies

The District recommends the County incorporate emission reduction strategies such as those listed below:

- Require cleanest available heavy-duty trucks and off-road equipment (see comment 3 and 6)
- Require HHD truck routing patterns that limit exposure of residential communities and sensitive receptors to emissions (see comment 4)
- Require minimization of heavy-duty truck idling (see comment 5)
- Require solid screen buffering trees, solid decorative walls, and/or other natural ground landscaping techniques are implemented along the property line of adjacent sensitive receptors
- Orient loading docks away from sensitive receptors unless physically impossible
- Require loading docks a minimum of 300 feet away from the property line of sensitive receptor unless dock is exclusively used for electric trucks
- Incorporate signage and “pavement markings” to clearly identify on-site circulation patterns to minimize unnecessary on-site vehicle travel
- Require truck entries be located on streets of a higher commercial classification
- Require projects be designed to provide the necessary infrastructure to support use of zero-emissions on-road vehicles and off-road equipment (see comment 7)
- Require all building roofs are solar-ready
- Require all portions of roof tops that are not covered with solar panels are constructed to have light colored roofing material with a solar reflective index of greater than 78
- Ensure rooftop solar panels are installed and operated to supply 100% of the power needed to operate all non-refrigerated portions of the development project
- Require power sources at loading docks for all refrigerated trucks have “plugin” capacity, which will eliminate prolonged idling while loading and unloading goods
- Incorporate bicycle racks and electric bike plug-ins
- Require the use of low volatile organic compounds (VOC) architectural and industrial maintenance coatings
- Designate an area during construction to charge electric powered construction vehicles and equipment, if temporary power is available
- Prohibit the use of non-emergency diesel-powered generators during construction

3) Cleanest Available HHD Trucks

The San Joaquin Valley will not be able to attain stringent health-based federal air quality standards without significant reductions in emissions from HHD trucks, the single largest source of NOx emissions in the San Joaquin Valley. Accordingly, to meet federal air quality attainment standards, the District's ozone and particulate matter attainment plans rely on a significant and rapid transition of HHD fleets to zero or near-zero emissions technologies.

The Project consists of an industrial park which is expected to generate a high volume of HHD truck traffic, including HHD trucks traveling to-and-from further trip length distances for potential distribution. The DEIR should discuss the use of zero and near-zero emissions technologies as mitigation measures for the Project. To reduce impacts from operational mobile source emissions, the District recommends that the following measures be considered for inclusion in the DEIR:

- *Recommended Measure*: Fleets associated with operational activities utilize the cleanest available HHD trucks, including zero and near-zero technologies.

- *Recommended Measure*: All on-site service equipment (cargo handling, yard hostlers, forklifts, pallet jacks, etc.) utilize zero-emissions technologies.

4) Truck Routing

Truck routing involves the assessment of which roads HHD trucks take to and from their destination, and the emissions impact that the HHD trucks may have on residential communities and sensitive receptors. Per the DEIR, the Project consists of an industrial park, which is expected to result in a high volume of HHD truck traffic.

Therefore, the District recommends that the DEIR include requirements for the project proponent to assess HHD truck routing patterns for the Project, with the aim of limiting exposure of residential communities and sensitive receptors to emissions. This evaluation would consider the current truck routes, the quantity and type of each truck (e.g., Medium Heavy-Duty, HHD, etc.), the destination and origin of each trip, traffic volume correlation with the time of day or the day of the week, overall Vehicle Miles Traveled (VMT), and associated exhaust emissions. The truck routing evaluation would also identify alternative truck routes and their impacts on VMT and air quality.

5) Reduce Idling of Heavy-Duty Trucks

The goal of this strategy is to limit the potential for localized PM2.5 and toxic air contaminant impacts associated with the idling of Heavy-Duty trucks. The diesel

exhaust from idling has the potential to impose significant adverse health and environmental impacts.

Since the Project consists of an industrial park, which is expected to result in HHD truck trips, the District recommends the DEIR include measures to ensure compliance of the state anti-idling regulation (13 CCR § 2485 and 13 CCR § 2480) and discuss the importance of limiting the amount of idling, especially near sensitive receptors. In addition, the District recommends the DEIR consider the feasibility of implementing a more stringent 3-minute idling restriction and requiring appropriate signage and enforcement of idling restrictions.

6) Electric On-Site Off-Road and On-Road Equipment

The Project consists of an industrial park, which may have the potential to result in increased use of off-road equipment (e.g., forklifts) and on-road equipment (e.g., mobile yard trucks with the ability to move materials). The District recommends that the DEIR include requirements for project proponents to utilize electric or zero emission off-road and on-road equipment.

7) Electric Infrastructure

The District recommends that the County require all nonresidential buildings be designed to provide electric infrastructure to support the use of on-road zero emissions vehicles, such as HHD trucks associated with warehouses and distribution buildings.

To support and accelerate the installation of electric vehicle charging equipment and development of required infrastructure, the District offers incentives to public agencies, businesses, and property owners of multi-unit dwellings to install electric charging infrastructure (Level 2 and 3 chargers). The purpose of the District's Charge Up! Incentive program is to promote clean air alternative-fuel technologies and the use of low or zero-emission vehicles. The District recommends that the County and project proponents install electric vehicle chargers at project sites, and at strategic locations.

Please visit https://ww2.valleyair.org/grants/charge-up for more information.

8) Health Risk Screening/Assessment and Ambient Air Quality Analysis

The District reviewed the Health Risk Assessment (HRA) and Ambient Air Quality Analysis (AAQA) for the Project and has identified several deficiencies, as listed below.

8a) Dispersion Modeling

- Multiple sources were not using a normalized emission rate of 1 gram/second, for example, the road improvement area source.
- Modeled roadways should represent the truck travel paths, both onsite and offsite, and represent on one travel path is connect to another.
- Sources of offsite travel on California State Route 99 were not placed adequately to evaluate the impacts to nearby receptors. There was only one source going northbound. Truck travel sources should be placed south of and along California State Route 99 (near the city of Bakersfield) to ensure that the impact to sensitive receptors be adequately evaluated.
- The roadway volume Length of Side (48 feet) does not appropriately represent the volume source that the trucks travel in. A 12-foot roadway width should be used.
- Emissions from structural areas modeled in the AAQA were assumed to start between 52-135 feet above the ground level. These sources should be modeled as elevated areas sources approximately 6-12 feet high.
- The following receptors should also be included in the HRA analysis:
  - Worksite - UTM Zone: 11, 307781 m E, 3927318 m N
  - Resident - UTM Zone: 11, 308667 m E, 3928040 m N

8b) HRA Report for Onsite/Offsite Truck Travel and Idling

Emissions from onsite truck travel and idling activities, if present, must be included as part of the operational emissions evaluated in the HRA. Reasonable estimates/assumptions should be made and included in the HRA analysis.

For truck travel and idling emission rates, the Project Analysis section of the Air Resources Board's online EMFAC tool should be used. It is located at: https://arb.ca.gov/emfac/project-analysis. The District recommends that the District be consulted on the specificity of inputs to be entered for the Project and when using non-default values. The following are examples of inputs to be used for the Project:

- "Annual" for the Season
- "T7 Tractor" for onsite HHD trucks travel and when using EMFAC 2021
- "Aggregate" for the Model Year
- The 5-25 mph speed bins for speed(s)
- "Diesel" for the fuel type

Additionally, offsite truck travel emissions should be evaluated for truck travel within a quarter (1/4) mile of the Project's site. If the trucks can leave the Project's site in multiple directions, it is recommended that truck travel in all

directions of travel be evaluated. A road width of 12 feet with a release height of 6 feet and a line-volume sources along the expected truck travel paths should be used in the air dispersion modeling of the onsite truck travel.

Overall, modifications to the HRA and/or AAQA based on the deficiencies listed above have the potential to cause the Project to exceed District health risk thresholds and/or cause or contribute to an exceedance of any ambient air quality standard. Therefore, the District recommends the HRA and AAQA be revised to ensure the analysis is representative and adequately reflects the Project's potential air quality impacts.

9) Vegetative Barriers and Urban Greening

There are residential units located south and north of the Project. The District suggests the County consider the feasibility of incorporating vegetative barriers and urban greening as a measure to further reduce air pollution exposure on sensitive receptors (e.g., residential units).

While various emission control techniques and programs exist to reduce air quality emissions from mobile and stationary sources, vegetative barriers have been shown to be an additional measure to potentially reduce a population's exposure to air pollution through the interception of airborne particles and the update of gaseous pollutants. Examples of vegetative barriers include, but are not limited to the following: trees, bushes, shrubs, or a mix of these. Generally, a higher and thicker vegetative barrier with full coverage will result in greater reductions in downwind pollutant concentrations. In the same manner, urban greening is also a way to help improve air quality and public health in addition to enhancing the overall beautification of a community with drought tolerant, low-maintenance greenery.

10) On-Site Solar Deployment

It is the policy of the State of California that renewable energy resources and zero-carbon resources supply 100% of retail sales of electricity to California end-use customers by December 31, 2045. While various emission control techniques and programs exist to reduce air quality emissions from mobile and stationary sources, the production of solar energy is contributing to improving air quality and public health. The District suggests that the County consider incorporating solar power systems as an emission reduction strategy for the Project.

11) District Rules and Regulations

The District issues permits for many types of air pollution sources, and regulates some activities that do not require permits. A project subject to District rules and regulations would reduce its impacts on air quality through compliance with the District's regulatory framework. In general, a regulation is a collection of individual

rules, each of which deals with a specific topic. As an example, Regulation II (Permits) includes District Rule 2010 (Permits Required), Rule 2201 (New and Modified Stationary Source Review), Rule 2520 (Federally Mandated Operating Permits), and several other rules pertaining to District permitting requirements and processes.

The list of rules below is neither exhaustive nor exclusive. Current District rules can be found online at: https://ww2.valleyair.org/rules-and-planning/current-district-rules-and-regulations. To identify other District rules or regulations that apply to future projects, or to obtain information about District permit requirements, the project proponents are strongly encouraged to contact the District's Small Business Assistance (SBA) Office at (661) 392-5665.

12) District Rules 2010 and 2201 - Air Quality Permitting for Stationary Sources

Stationary Source emissions include any building, structure, facility, or installation which emits or may emit any affected pollutant directly or as a fugitive emission. District Rule 2010 (Permits Required) requires operators of emission sources to obtain an Authority to Construct (ATC) and Permit to Operate (PTO) from the District. District Rule 2201 (New and Modified Stationary Source Review) requires that new and modified stationary sources of emissions mitigate their emissions using Best Available Control Technology (BACT).

This Project may be subject to District Rule 2010 (Permits Required) and Rule 2201 (New and Modified Stationary Source Review) and may require District permits. Prior to construction, the Project proponent should submit to the District an application for an ATC. For further information or assistance, the project proponent may contact the District's SBA Office at (661) 392-5665.

13) District Rule 9510 - Indirect Source Review (ISR)

The Project is subject to District Rule 9510 because it will receive a project-level discretionary approval from a public agency and will equal or exceed 25,000 square foot of light industrial.

The purpose of District Rule 9510 is to reduce the growth in both NOx and PM emissions associated with development and transportation projects from mobile and area sources; specifically, the emissions associated with the construction and subsequent operation of development projects. The ISR Rule requires developers to mitigate their NOx and PM emissions by incorporating clean air design elements into their projects. Should the proposed development project clean air design elements be insufficient to meet the required emission reductions, developers must

pay a fee that ultimately funds incentive projects to achieve off-site emissions reductions.

Per Section 5.0 of the ISR Rule, an Air Impact Assessment (AIA) application is required to be submitted no later than applying for project-level approval from a public agency. As of the date of this letter, the District has not received an AIA application for this Project. Please inform the project proponent to immediately submit an AIA application to the District to comply with District Rule 9510 so that proper mitigation and clean air design under ISR can be incorporated into the Project's design. One AIA application should be submitted for the entire Project.

Information about how to comply with District Rule 9510 can be found online at: https://ww2.valleyair.org/permitting/indirect-source-review-rule-overview

The AIA application form can be found online at: https://ww2.valleyair.org/permitting/indirect-source-review-rule-overview/forms-and-applications/

District staff is available to provide assistance and can be reached by phone at (559) 230-5900 or by email at ISR@valleyair.org.

14) District Rule 9410 (Employer Based Trip Reduction)

The Project may be subject to District Rule 9410 (Employer Based Trip Reduction) if the project would result in employment of 100 or more "eligible" employees. District Rule 9410 requires employers with 100 or more "eligible" employees at a worksite to establish an Employer Trip Reduction Implementation Plan (eTRIP) that encourages employees to reduce single-occupancy vehicle trips, thus reducing pollutant emissions associated with work commutes. Under an eTRIP plan, employers have the flexibility to select the options that work best for their worksites and their employees.

Information about District Rule 9410 can be found online at: https://ww2.valleyair.org/compliance/rule-9410-employer-based-trip-reduction/.

For additional information, you can contact the District by phone at 559-230-6000 or by e-mail at etrip@valleyair.org

15) District Rule 4002 (National Emissions Standards for Hazardous Air Pollutants)

In the event an existing building will be renovated, partially demolished or removed, the Project may be subject to District Rule 4002. This rule requires a thorough inspection for asbestos to be conducted before any regulated facility is demolished or renovated.

Information on how to comply with District Rule 4002 can be found online at: https://ww2.valleyair.org/compliance/demolition-renovation/

16) District Rule 4601 (Architectural Coatings)

The Project will be subject to District Rule 4601 since it is expected to utilize architectural coatings. Architectural coatings are paints, varnishes, sealers, or stains that are applied to structures, portable buildings, pavements or curbs. The purpose of this rule is to limit VOC emissions from architectural coatings. In addition, this rule specifies architectural coatings storage, cleanup and labeling requirements. Additional information on how to comply with District Rule 4601 requirements can be found online at: https://ww2.valleyair.org/media/tkgjeusd/rule-4601.pdf

17) District Regulation VIII (Fugitive PM10 Prohibitions)

The project proponent may be required to submit a Construction Notification Form or submit and receive approval of a Dust Control Plan prior to commencing any earthmoving activities as described in Regulation VIII, specifically Rule 8021 – *Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities.*

Should the project result in at least 1-acre in size, the project proponent shall provide written notification to the District at least 48 hours prior to the project proponents intent to commence any earthmoving activities pursuant to District Rule 8021 (Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities). Also, should the project result in the disturbance of 5-acres or more, or will include moving, depositing, or relocating more than 2,500 cubic yards per day of bulk materials, the project proponent shall submit to the District a Dust Control Plan pursuant to District Rule 8021 (Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities). For additional information regarding the written notification or Dust Control Plan requirements, please contact District Compliance staff at (559) 230-5950.

The application for both the Construction Notification and Dust Control Plan can be found online at: https://ww2.valleyair.org/media/fm3jrbsq/dcp-form.docx

Information about District Regulation VIII can be found online at: https://ww2.valleyair.org/dustcontrol

18) Other District Rules and Regulations

The Project may also be subject to the following District rules: Rule 4102 (Nuisance) and Rule 4641 (Cutback, Slow Cure, and Emulsified Asphalt, Paving and Maintenance Operations).

19)District Comment Letter

The District recommends that a copy of the District's comments be provided to the Project proponent.

If you have any questions or require further information, please contact Michael Corder by e-mail at Michael.Corder@valleyair.org or by phone at (559) 230-6000.

Sincerely,

Tom Jordan
Director of Policy and Government Affairs



Mark Montelongo
Program Manager

July 29, 2024

Advocates for the Environment

A non-profit public-interest law firm
and environmental advocacy organization



Katrina Slayton
Division Chief
Kern County Planning and Natural Resources Department
2700 M Street Suite 100
Bakersfield, CA 93301

Via U.S. Mail and email to slaytonk@kerncounty.com

Re: Comments on Draft Environmental Impact Report for Malibu Vineyards Industrial Parkway Project, SCH No. 2022080056

Dear Ms. Slayton:

Advocates for the Environment submits the comments in this letter regarding the Draft Environmental Impact Report (**DEIR**) for the Malibu Vineyards Industrial Parkway Project (**Project**). The Project Site is located near Imperial Avenue and Seco Road in the County of Kern (**County**). The Project proposes to develop the 739-acres Project Site by constructing 24 warehouses on 8,907,446 square feet of industrial use space. We have reviewed the DEIR prepared in July 2024 and submit comments regarding the sufficiency of the DEIR's Greenhouse-Gas (**GHG**) analysis under the California Environmental Quality Act (**CEQA**).

The County Should Require the Project to be Net-Zero

Given the current regulatory context and technological advancements, a net-zero significance threshold is feasible and extensively supportable. GHG emissions from buildings, including indirect emissions from offsite generation of electricity, direct emissions produced onsite, and from construction with cement and steel, amounted to 21% of global GHG emissions in 2019. (IPCC Sixth Assessment Report, Climate Change 2022, WGIII, Mitigation of Climate Change, p. 9-4.) This is a considerable portion of global GHG emissions. It is much more affordable to construct new building projects to be net-zero than to obtain the same level of GHG reductions by expensively retrofitting older buildings to comply with climate change regulations. Climate damages will keep increasing until we reach net zero GHG emissions, and there is a California state policy requiring the state to be net-zero by 2045. It therefore is economically unsound to construct new buildings that are not net-zero.

Environmental groups have achieved tremendous outcomes by litigation under CEQA. Two of the largest mixed-use development projects in the history of California, Newhall Ranch (now FivePoint Valencia), and Centennial (part of Tejon Ranch) decided to move forward as net-zero communities after losing CEQA lawsuits to environmental groups. The ability for these large projects

to become net-zero indicates that it is achievable, even for large-scale developments. The Applicant for this Project should do the same.

We urge the County to adopt net-zero as the GHG significance threshold for this project. This threshold is well-supported by plans for the reduction of GHG emissions in California, and particularly the CARB Climate Change Scoping Plans. The CARB 2017 Scoping Plan states that "achieving no net additional increase in GHG emissions, resulting in no contribution to GHG impacts, is an appropriate overall objective for new development." (CARB 2017 Scoping Plan, p. 101.) Additionally, the CARB 2022 Scoping Plan reaffirms the necessity of a net zero target by expressing: "it is clear that California must transition away from fossil fuels to zero-emission technologies with all possible speed … in order to meet our GHG and air quality targets." (CARB 2022 Scoping Plan, p. 184.) CARB further encourages a net-zero threshold in its strategies for local actions in Appendix D to the 2022 Scoping Plan. (CARB 2022 Scoping Plan, Appendix D p. 24-26.)

Moving this Project forward as a net-zero project would not only be the right thing for the County to do, but also would also help protect the County and the Applicant from CEQA GHG litigation.

GHG Mitigation is Insufficient under CEQA

The calculated project-related emissions amount to 77,974 metric tons of carbon dioxide equivalent (**MTCO2e**) per year (DEIR, p. 4.8-19). The County adopted a significance threshold based on Appendix G of the CEQA Guidelines. Based on this threshold, the County concluded the Project would have significant GHG emissions. To reduce this identified significant GHG impact, the GHG Analysis offered GHG Mitigation Measures (**MM-GHG**) 4.8-1 and 4.8-2, as well as Air Quality Mitigation Measures (**MM-AIR**) 4.3-1, 4.3-3, and 4.3-4. (DEIR, p. 4.8-20.)

The DEIR did not provide evidence that there was no further feasible mitigation, generally declaring the GHG impact "significant and unavoidable" (DEIR, p. 4.8-26.) The County did not provide any rationale why, in this instance, existing regulations and the adopted mitigation measures would be the only feasible mitigation for this Project. Despite the availability of other GHG mitigation measures, the DEIR declared that the Project's mitigated emissions were unavoidable. However, because this conclusion is not supported by substantial evidence, the DEIR should have included more mitigation to reduce the Project's GHG emissions to the extent required by CEQA.

MM-GHG 4.8-1 is Improperly Deferred

There is no indication that certain mitigation measures would commit the lead agency to the future achievement of performance standards and guarantees, which constitutes improper deferral. In particular, MM-GHG 4.8-1 describes elements of plans to be later prepared and adopted in the future, rather than specific, measurable mitigation standards to be decided as part of the CEQA information-sharing process before the Project approval. MM-GHG 4.8-1 requires a future GHG

report to identify measures for a 29% reduction in the project's operational mobile CO2e emissions. Additionally, it allows substitution with any mitigation program adopted by Kern County that provides equal or more effective mitigation. (DEIR, p. 4.8-20.) CEQA mandates that mitigation measures must be identified and analyzed during the EIR process to ensure they are feasible and will effectively mitigate significant impacts. Here, the details of the measure are deferred, with options to either identify reduction measures or participate in a Kern County adopted program. The County's failure to specify performance standards for future mitigation measures in the DEIR constitutes an improper deferral, violating CEQA.

Infeasibility Finding Lacks Substantial Evidence

The conclusion that the Project will not be able to achieve any mitigation beyond which was identified in the proposed mitigation measures is not supported with substantial evidence. The DEIR should have proposed more mitigation measures to be applied to the maximum-feasible extent in order to justify the conclusion that the Project's GHG impact would be unavoidable due to lack of feasibility of further mitigation. While the proposed mitigation measures are a good start, the County did not demonstrate that these actions would represent the maximum feasible mitigation to support a finding that the Project's impact would be significant and unavoidable.

CEQA requires that the lead agency identifies specific reasons for infeasibility of further mitigation when concluding significant and unavoidable impact. The County did not attempt to specify any infeasible mitigation measures when concluding that the Project's GHG impact would be unavoidable, nor did it provide any reasoning that the identified mitigation measures represent the maximum feasible mitigation.

Thus, the conclusion that further mitigation is infeasible was not supported by substantial evidence; there are other readily available mitigation measures, especially considering that 75.51%[1] of the Project's GHG impact originates from mobile emissions which the mitigation measures were not focused on reducing. For instance, the County could mandate that the applicant's lease agreements include clauses limiting the use of heavy-duty diesel trucks, or that tenants' vehicle fleets use non-diesel fuels such as gasoline, ethanol, or biofuels. Additionally, the County could require the applicant to ensure that future tenants use hybrid or zero-emission commercial vehicles when these become reasonably available and to maintain a charging system for the vehicle fleet powered by solar panels on the project site. This kind of mitigation is both feasible and necessary to offset the project's fair share of emissions.

Thus, the conclusion that further mitigation is infeasible was not supported by substantial evidence.

[1] $\left(\frac{58{,}880\ \text{MTCO2e}}{77{,}974\ \text{MTCO2e}}\right) \times 100 = 75.51\%$

The Project's GHG Impacts Must be Fully Mitigated

CEQA requires that the Project include fair-share mitigation for all significant cumulative impacts. (*Napa Citizens for Honest Gov't v. Napa County Board of Supervisors* (2001) 91 Cal.App.4th 342, 364.) Here, this means mitigation of the full extent of the Project's GHG impacts. The DEIR claims that no other mitigation measures are feasible, beyond the identified mitigation measures. But that conclusion is incorrect, and not supported by substantial evidence.

The amount of GHG emissions that comprise the Project's fair share is clear. The reasonable lifespan of U.S. warehouses is 43 years on average as indicated by a 2022 study conducted by CBRE[2]. Therefore, the Project would likely contribute over 3 million MTCO2e during its average lifespan.[3] This would be a good starting point from which to subtract the effect of additional non-offset mitigation measures, before implementing offset purchases.

CEQA does not distinguish between mobile and non-mobile sources of GHG emissions; the lead agency can mitigate cumulative GHG impacts through any measure. Several on-site mitigation measures are feasible, including the installation and use of solar water heaters among many other mitigation strategies that can be incorporated in the project as design features or as mitigation measures. Such features could be adopted individually or as part of a comprehensive goal of sustainable building certification, such as achieving higher levels of Leadership and Energy and Environmental Design (LEED) certification, beyond the certified level and extending further beyond CALGreen requirements.

The project also proposes 2,196,684 square feet of refrigerated warehouse space. (DEIR, p. 3-22.) However, there is no proposed mitigation for warehouse refrigeration storage nor any mention of Transportation Refrigeration Units (**TRUs**) which one can make a reasonable assumption will be used. The County should commit to low-warming HFCs or other alternatives to traditional coolants, as well as energy-efficient refrigeration systems.

Solar panel installation or incorporating renewable energy production on-site is also a feasible mitigation measure. The DEIR indicates that the Project will comply with Title 24 requirements. (DEIR, p. 4.3-24.) However, Title 24 mandates only that at minimum of 15 percent of the roof area be solar-ready. Extending this requirement to cover the maximum available surface area, rather than just the minimum 15 percent required would be feasible. Additionally, installing solar panels across the entire available roof surface would also be a feasible measure. Having solar panels capable of offsetting 100% of the buildings' energy demands would enhance the effectiveness and decrease GHG emissions overall.

---

[2] CBRE Research available at https://www.cbre.com/insights/briefs/aging-warehouse-inventory-justifies-record-development?linkId=181414987&utm_source=Press+release&utm_medium=Press+release&utm_campaign=awareness_united_states_ageing_warehouse_22_9_14_&utm_id=Sept+2022+Industrial+brief&utm_content=static (Accessed July 23, 2024).

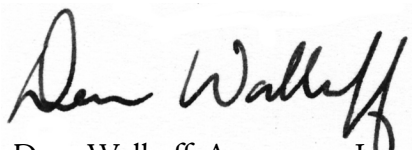
[3] 77,974 MTCO2e per year × 43 years = 3,352,882 MTCO2e

Even after implementing operational emissions reductions to the maximum feasible extent, the County could also require the Applicant to purchase carbon offsets for the Project's remaining GHG emissions. The County did not provide any evidence for why offsets would be infeasible. Overall, there are more options available to mitigate emissions to the full extent of project emissions.

Conclusion

The DEIR fails to require all feasible mitigation, despite concluding that the significant GHG impact will be unavoidable. The lead agency has not met its burden of showing that such measures are infeasible, and therefore the DEIR should be amended to reflect all feasible mitigation to the fair-share extent. Please put me on the interest list to receive updates about the progress of this Project. We make this request under Public Resources Code, section 21092.2.

Sincerely,



Dean Wallraff, Attorney at Law
Executive Director, Advocates for the Environment

10211 Sunland Blvd., Shadow Hills, CA 91040 (818) 650-0030 X101 dw@aenv.org

August 6, 2024

VIA ELECTRONIC SUBMISSION

Kern County Planning and Natural Resources Department
Attention: Katrina Slayton, Division Chief
2700 M Street, Suite 100
Bakersfield, CA 93301
Slaytonk@kerncounty.com
planning@kerncounty.com

Supervisor David Couch
Kern County Board of Supervisor, District 4
Administrative Office
1115 Truxtun Avenue, Fifth Floor
Bakersfield, CA 93301
district4@kerncounty.com

Re: Proposed Malibu Vineyards Industrial Parkway Project - Public Participation

Dear Ms. Slayton and Supervisor Couch:

The Center on Race, Poverty & the Environment ("CRPE"), the Committee for a Better Shafter, the Delano Guardians, the Comité Progreso de Lamont, and the Committee for a Better Arvin are writing to share our concerns with the County's public participation process for the proposed Malibu Vineyards Industrial Parkway Project ("Malibu Vineyards") planned near Shafter and Bakersfield. Our organizations advocate to achieve environmental justice and healthy and sustainable communities in rural Kern County through collective action and the law.

As Kern County increasingly becomes a destination for new and expanded industrial parks and goods movement development, residents directly impacted by these projects must have an opportunity to be fully informed about the proposals and meaningfully engage in the CEQA process. Given the local and regional impact of a project like the proposed Malibu Vineyard Industrial Parkway, we ask that the County provide additional time and opportunities for the public to understand the County's environmental analyses and provide input to be incorporated into the Final Environmental Impact Report ("EIR").

The public, and the communities who would neighbor this project, must be given sufficient time and space to fully review and vet this Project. While we encourage the County to

be expansive about its outreach and public engagement, we request that the County take the following specific actions:

Extend the public comment period. The County should extend the 45-day public comment period to 90 days. The Draft EIR and attached materials are over 4,000 pages long and contain dense and technical analyses. The current 45-day period is insufficient to allow the public, particularly those without technical expertise, to adequately digest the analysis, ask questions, and provide decision-makers with input. This is especially true for residents who are non-English speakers, as discussed in further detail below.

At a minimum, hold at least one accessible public hearing. Under CEQA, the public must receive information about this proposed project and the impact that it will have on the environment and surrounding communities. To achieve this, the County should invite and receive verbal public comments from impacted communities and the rest of the public. Nearby communities of Shafter and Bakersfield would especially benefit from this opportunity and will provide the County with crucial input that will strengthen its environmental analysis. Public hearings must also be easily accessible to Spanish-speaking community members by providing two-way, simultaneous Spanish and English interpretation for oral presentations and public comments, providing Spanish language version slides and written materials, and removing time limits on public comments.

Translate materials into Spanish and other commonly spoken languages. The County failed to provide a Spanish-language version of any portion of the Draft EIR, preventing many community members from meaningfully participating as required under CEQA. According to the U.S. Census, about 63% of Shafter residents speak a language other than English at home, with the majority being Spanish speakers. Due to the County's failure to translate the materials, many of Shafter's residents are effectively prevented from exercising their right to participate in the CEQA process. Translating the Draft EIR materials will provide impacted residents with necessary information about a major project impacting their communities and genuinely allow for public participation intended by CEQA. Therefore, the County should translate at least all notices and the executive summary into Spanish and any other commonly spoken language. Upon translating the Draft EIR materials (including notices), the County should reopen the public comment period for another 90 days.

Hold a meeting with community members/stakeholders. The County should meet with interested community groups and stakeholders to discuss concerns and input related to the proposed project. This will allow community members to ask questions and receive direct responses, as well as provide relevant input to decision-makers. Any input received in these meetings should become part of the administrative record for the proposed project.

Postpone the Kern County Planning Commission hearing on the proposed project scheduled for October 24, 2024. The current timeline would only provide the County with less than two months to review and respond to public comments and incorporate relevant feedback into a Final EIR. It also provides the public with an extremely limited opportunity to review the Final EIR and submit additional input to the Planning Commission. The County should postpone

the Planning Commission hearing facilitate the extension of the public comment period to 90 days and allow for public hearings on the project to be held. This will give the County more time to incorporate input received from the public into the Final EIR. Moreover, the County must make the Final EIR publicly available well in advance of the Planning Commission hearing.

Public participation in government decision-making is a primary objective of CEQA. The County has fallen short of meeting this objective in its public engagement process for this proposed project to date, but the actions outlined above will comply with the letter and spirit of CEQA and facilitate the public's engagement in the CEQA process for a proposal that will have significant and irreversible impacts on their communities.

We appreciate your consideration of our requests and request a response by Monday, August 12. We look forward to further discussions with you regarding the proposed Malibu Vineyards project.

Sincerely,

Grecia Orozco
Kayla Karimi
Natalia Ospina
The Center on Race, Poverty & the Environment

Anabel Marquez, President
Committee for a Better Shafter

Gloria Herrera, President
Delano Guardians

Estela Escoto, President
Committee for a Better Arvin

Diana Mireles, President
Comité Progreso de Lamont

Transmission Technical
Services Department

9400 Oakdale Ave
Chatsworth, CA 91311
SC9314

August 13, 2024

Katrina Slayton
Kern County
SlaytonK@kerncounty.com

Subject: **Malibu Vineyards Industrial Parkway Project by Malibu Vineyards, LP (PP21H6);**
Adoption of Specific Plan; GPA 9, Map 80; GPA 23, Map 81; ZCC 13, Map 80; ZCC 92, Map 81; PD 2, Map
80; PD 74, Map 81; PD 75, Map 81

DCF: **1479-24NC**

The Transmission Department of SoCalGas does not operate any facilities within your proposed improvement. However, the Distribution Department of SoCalGas may maintain and operate facilities within your project scope.

To assure no conflict with the Distribution's pipeline system, please e-mail them at:

NorthwestDistributionUtilityRequest@semprautilities.com

Best Regards,
Nerses Papazyan
SoCalGas Transmission Technical Services
SoCalGasTransmissionUtilityRequest@semprautilities.com

LOZEAU DRURY LLP
T 510.836.4200
F 510.836.4205
1939 Harrison Street, Ste. 150
Oakland, CA 94612
www.lozeaudrury.com
rebecca@lozeaudrury.com

August 16, 2024

Via Email
Katrina Slayton, Division Chief
Planning and Natural Resources Department
County of Kern
Public Services Building
2700 M Street #100
Bakersfield, CA 93301
slaytonk@kerncounty.com

Re: Comment on Draft Environmental Impact Report, Malibu Vineyards Industrial Parkway Project (SCH 2022080056)

Dear Ms. Slayton:

This comment is submitted on behalf of Supporters Alliance for Environmental Responsibility ("SAFER") regarding the Draft Environmental Impact Report ("DEIR") prepared for the Malibu Vineyards Industrial Parkway Project (SCH 2022080056), which proposes the development of 8,786,734 square feet of industrial use space, comprised of 24 buildings on approximately 739 acres of existing vineyard, located north of Imperial Avenue and generally east of State Route 99 (SR99), with site access from Saco Road and Imperial Avenue in the County of Kern ("Project").

SAFER is concerned that the DEIR fails as an informational document and fails to impose all feasible mitigation measures to reduce the Project's impacts. SAFER requests that the Planning and Natural Resources Department address these shortcomings in a revised draft environmental impact report ("RDEIR") and recirculate the RDEIR prior to considering approvals for the Project.

SAFER reserves the right to supplement these comments during the administrative process. *Galante Vineyards v. Monterey Peninsula Water Management Dist*., 60 Cal. App. 4th 1109, 1121 (1997).

Sincerely,



Rebecca Davis
Lozeau Drury LLP

BLUM, COLLINS & HO LLP
ATTORNEYS AT LAW
AON CENTER
707 WILSHIRE BOULEVARD
SUITE 4880
LOS ANGELES, CALIFORNIA 90017
(213) 572-0400

August 28, 2024

Katrina Slayton
Division Chief
Kern County Planning and Natural Resources Department
2700 M Street Suite 100
Bakersfield, CA 93301

Via Email to:
slaytonk@kerncounty.com

Subject: Comments on Malibu Vineyards Industrial Parkway Project EIR (SCH NO. 2022080056)

Dear Ms. Slayton,

Thank you for the opportunity to comment on the Environmental Impact Report (EIR) for the proposed Malibu Vineyards Industrial Parkway Project. Please accept and consider these comments on behalf of Golden State Environmental Justice Alliance. Also, Golden State Environmental Justice Alliance formally requests to be added to the public interest list regarding any subsequent environmental documents, public notices, public hearings, and notices of determination for this project. Send all communications to Golden State Environmental Justice Alliance P.O. Box 79222 Corona, CA 92877.

1.0 Summary

The project proposes the conversion of agricultural lands (vineyard) to industrial lands via adoption of the proposed Malibu Vineyards Industrial Parkway Specific Plan. The proposed uses within the Specific Plan will accommodate a maximum of 8,907,446 square feet of Medium Industrial development on approximately 739 gross acres. The project will be comprised of twenty-four industrial buildings and associated office space developed over two phases. Warehousing, distribution, high-cube transloading, and short-term storage will represent the probable combination of businesses that will operate within the development. Approximately twenty-five percent of the proposed square footage (approximately 2,196,684 square-feet) would include refrigerated warehouse space. Zoning for the Specific Plan area will be M-2 PD (Medium Industrial, Precise Development) and the land use designation will be SI (Service Industrial).

Phase 1 involves development of 14 buildings totaling up to 7,242,106 square feet of warehouse and office space on approximately 534 acres, creating 14 parcels with on-site drainage basins.

Parking would include 4,796 standard spaces and 3,568 truck parking spaces, for a total of 8,364 spaces.

Phase 2 involves development of ten buildings totaling up to 1,665,340 square feet of warehouse and office space, on approximately 205 acres, creating ten parcels with on-site drainage basins. Parking would include 2,130 standard parking spaces and 924 truck parking spaces, for a total of 3,054 spaces.

PG&E would construct an electrical substation and distribution system to serve the project site. The site may be developed with solar panels in addition to tiered electric vehicle charging stations. The project would include a connection to the existing gas facilities, a new natural gas pressure reducing station, as well as gas main extension and distribution laterals within the project site.

The following discretionary actions are required to implement the proposed project:

1. Adoption of the Malibu Vineyard Industrial Parkway Specific Plan.
2. Amendment to the Kern County General Plan Land Use, Open Space and Conservation Element from Map Code 8.1 (Intensive Agriculture) to Map Code 4.1 (Accepted County Plan Area) for approximately 193 acres; upon approval of the Malibu Vineyards Industrial Parkway Specific Plan, the Map Code 7.2 (Service Industrial) would be established (GPA No. 9, Map 80).
3. Amendment to the Kern County Metropolitan Bakersfield General Plan Land Use Element from Map Code R-IA (Intensive Agriculture) to Map Code SI (Service Industrial) for approximately 545 acres; upon approval of the Malibu Vineyards Industrial Parkway Specific Plan, the Map Code SI (Service Industrial) would be established (GPA No. 23, Map 81).
4. Change in zone classification from A (Exclusive Agriculture) to M-2 PD (Medium Industrial, Precise Development) on approximately 193.33 acres (Zone Change No. 13, Map 80).
5. Change in zone classification from A (Exclusive Agriculture) to M-2 PD (Medium Industrial, Precise Development) on approximately 545.15 acres (Zone Change No. 92, Map 81).
6. Approval of Precise Development Plan No. 2, Map 80 for site development and implementation of the M-2 PD zoning request.
7. Approval of Precise Development Plan No. 74, Map 81 for site development and implementation of the M-2 PD zoning request.
8. Approval of Precise Development Plan No. 75, Map 81 for site development and implementation of the M-2PD zoning request.

3.0 Project Description

The EIR does not include detailed building elevations, floor plans, or a conceptual grading plan. The basic components of a Planning Application include a detailed site plan, floor plan, conceptual grading plan, written narrative, and detailed elevations. There are no building elevations provided, which are vital to review the maximum building height as the proposed project is located within Meadows Field Airport Compatibility Zone B2 and Zone C. There are no grading plans provided and the EIR does not provide any information regarding the required quantity of cut/fill material during the grading phase of construction. Providing the complete grading plan to verify the earthwork quantities is vital as this directly informs the quantity of necessary truck hauling trips due to soil import/export during the grading phase of construction. A revised EIR must be prepared to include wholly accurate and unedited detailed floor plan, grading plan, building elevations, and project narrative for public review.

4.3 Air Quality, 4.6 Energy, and 4.8 Greenhouse Gas Emissions

Please refer to attachments from SWAPE for a complete technical commentary and analysis.

The EIR does not include for analysis relevant environmental justice issues in reviewing potential impacts, including cumulative impacts from the proposed project. The EIR provides general information about Calenviroscreen but does not provide meaningful analysis regarding project census tract and the health impacts of pollution. This is in conflict with CEQA Guidelines Section 15131 (c), which requires that "Economic, social, and particularly housing factors shall be considered by public agencies together with technological and environmental factors in deciding whether changes in a project are feasible to reduce or avoid the significant effects on the environment identified in the EIR. If information on these factors is not contained in the EIR, the information must be added to the record in some other manner to allow the agency to consider the factors in reaching a decision on the project." This is especially significant as the surrounding community is highly burdened by pollution. According to CalEnviroScreen 4.0[1], CalEPA's screening tool that ranks each census tract in the state for pollution and socioeconomic vulnerability. The proposed project's census tract (6029003900) is ranked in the 88th percentile for overall pollution burden, meaning the surrounding community bears the impact of multiple sources of pollution and is more polluted than average on several pollution indicators measured by CalEnviroScreen. For example, the project census tract ranks in the 88th percentile for ozone burden and 98th percentile for particulate matter (PM) 2.5 burden. Both of these environmental factors are typically attributed to heavy car and truck activity in the area. While California has strict vehicle-emissions standards, exhaust from cars and trucks is the main source of air pollution

[1] CalEnviroScreen 4.0 https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40

in much of the state[2]. Ozone can cause lung irritation, inflammation, and worsening of existing chronic health conditions, even at low levels of exposure[3]. Fine particle pollution has been shown to cause many serious health effects, including heart and lung disease and exposure to PM 2.5 contributes to deaths across California[4].

The census tract ranks among the most severely impacted in several areas that impact water quality. The census tract ranks in the 60th percentile for groundwater threats. People who live near contaminated groundwater may be exposed to chemicals moving from the soil into the air inside their homes[5]. Accordingly, the census tract ranks in the 97th percentile for drinking water impacts, which indicates that it ranks with the worst quality drinking water in the state. Poor communities and people in rural areas are exposed to contaminants in their drinking water more often than people in other parts of the state[6].

The census tract also ranks in the 42nd percentile for solid waste facility impacts and 82nd percentile for hazardous waste facility impacts. Solid waste facilities can expose people to hazardous chemicals, release toxic gases into the air (even after these facilites are closed), and chemicals can leach into soil around the facility and pose a health risk to nearby populations[7]. Hazardous waste generators and facilities contribute to the contamination of air, water and soil near waste generators and facilities can harm the environment as well as people[8].

Further, the census tract is a diverse community including 56% Hispanic, 8% African-American and 1% Native American residents, whom are especially vulnerable to the impacts of pollution. The community has a high rate of low educational attainment, meaning 88% of the census tract over age 25 has not attained a high school diploma, which is an indication that they may lack health insurance or access to medical care. The community also has a high rate of poverty, meaning 68% of the households in the census tract have a total income before taxes that is less than the poverty level. Income can affect health when people cannot afford healthy living and working conditions, nutritious food and necessary medical care[9]. Poor communities are often located in areas with high levels of pollution[10]. Poverty can cause stress that weakens the immune system and causes

---

[2] OEHHA Traffic https://oehha.ca.gov/calenviroscreen/indicator/traffic-density
[3] OEHHA Ozone Burden https://oehha.ca.gov/calenviroscreen/indicator/air-quality-ozone
[4] OEHHA Air Quality: PM 2.5 https://oehha.ca.gov/calenviroscreen/indicator/air-quality-pm25
[5] OEHHA Groundwater Threats https://oehha.ca.gov/calenviroscreen/indicator/groundwater-threats
[6] OEHHA Drinking Water https://oehha.ca.gov/calenviroscreen/drinking-water
[7] OEHHA Solid Waste Facilities https://oehha.ca.gov/calenviroscreen/indicator/solid-waste-sites-and-facilities
[8] OEHHA Hazardous Waste Generators and Facilities https://oehha.ca.gov/calenviroscreen/indicator/hazardous-waste-generators-and-facilities
[9] OEHHA Poverty https://oehha.ca.gov/calenviroscreen/indicator/poverty
[10] Ibid.

people to become ill from pollution[11]. Living in poverty is an indication that residents may lack health insurance or access to medical care. Medical care is vital for this census tract as it ranks in the 73rd percentile for incidence of asthma and 83rd percentile for incidence of cardiovascular disease.

Additionally, the project census tract (6029003900) and the census tracts adjacent to the project site (6029005103 (east), 6029004604 (north), and (6029000101) (extends east and south) are identified as SB 535 Disadvantaged Communities[12]. This indicates that cumulative negative impacts of development and environmental impacts in the area are disproportionately impacting these communities. The EIR does not discuss that the surrounding area is a disadvantaged community and does not utilize this information in its analysis. The EIR has not considered the project's significant and unavoidable environmental impacts in relation to the SB 535 status of the project census tract and surrounding area. The negative environmental, health, and quality of life impacts of the warehousing and logistics industry in the area have become distinctly inequitable. The severity of environmental impacts particularly on these Disadvantaged Communities must be included for analysis as part of a revised EIR.

The State of California lists three approved compliance modeling softwares[13] for non-residential buildings: CBECC-Com, EnergyPro, and IES VE. CalEEMod is not listed as an approved software. The CalEEMod modeling does not comply with the 2022 Building Energy Efficiency Standards and under-reports the project's significant Energy impacts and fuel consumption to the public and decision makers. Since the EIR did not accurately or adequately model the energy impacts in compliance with Title 24, it cannot conclude the project will generate less than significant impacts and a finding of significance must be made. A revised EIR with modeling using one of the approved software types must be prepared and circulated for public review in order to adequately analyze the project's significant environmental impacts. This is vital as the EIR utilizes CalEEMod as a source in its methodology and analysis, which is clearly not an approved software.

4.9 Hazards and Hazardous Materials

The southern portions of the project site are within the Airport Land Use Compatibility Plan (ALUCP) for the Meadows Field Airport located approximately 1.5 miles southeast. These portions of the project are in ALUCP Zone B2 and Zone C. The EIR states that, "Pursuant to the

[11] Ibid.
[12] OEHHA SB 535 Census Tracts https://oehha.ca.gov/calenviroscreen/sb535
[13] California Energy Commission 2022 Energy Code Compliance Software https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2022-building-energy-efficiency-1

Meadows Field ALUCP, future parcels within Compatibility Zone B-2 may need to dedicate an avigation easement, possibly including height restrictions, and the southeast corner of Phase 1, which includes Compatibility Zone C, may would also require an avigation easement with a 35-foot object height restriction," and that Zone C also "limits high-rise office buildings to no more than four stories."

The proposed project has not been reviewed by the Kern County Board of Supervisors for compatibility with the ALUCP. The proposed project requires a General Plan Amendment and Zone Change to change the land use designations on the project site and create a new Zoning District, Service Industrial. Prior to the amendment of a General Plan, the ALUC shall review the plan, ordinance, or regulation for consistency with the ALUCP (PUC Section 21676(b))[14]. The EIR delays FAA review to after the close of the CEQA public review process via Mitigation Measure MM 4.11-2. Statutorily required review by the Board of Supervisors has not been completed. The EIR must be revised to include a finding of significance as it does not comply with PUC Section 21676(b) and therefore has not provided any meaningful evidence to conclude the project will not result in a safety hazard or excessive noise for people residing or working in the Project area.

4.11 Land Use and Planning

The EIR concludes that the proposed project is consistent with the General Plan without considering the EIR's conclusion that the project will result in significant and unavoidable cumulatively considerable impacts to Aesthetics, Agricultural Resources, Air Quality, Greenhouse Gases, Hydrology and Water Quality, Noise, Population and Housing, Transportation and Traffic, and Utilities (Water Supply). This is especially notable as the proposed project requires a GPA/ZC and the creation of a new Zoning designation to proceed. The EIR is inadequate as an informational document and a revised EIR must be prepared with a consistency analysis that considers the project's significant and unavoidable impacts in its analysis, including but not limited to the following goals and policies that were adopted for the purposes of avoiding or mitigating an environmental effect:

1. Land Use Element Policy 1: Provide for the following types of land uses, as depicted on the Land Use Plan (I-1).
2. Land Use Element Policy 91: Encourage employers and developers of employee-intensive commercial and industrial projects to provide facilities or referral services for the child care needs of employees (I-14).

[14] California Airport Planning Land Use Handbook Section 1.3.4. ALUC Review https://dot.ca.gov/-/media/dot-media/programs/aeronautics/documents/californiaairportlanduseplanninghandbook-a11y.pdf

3. Circulation Element Goal 3: Minimize the impact of truck traffic on circulation and on noise-sensitive land uses.
4. Circulation Element Goal 4: Provide a street system that creates a positive image of Bakersfield and contributes to residents' quality of life.
5. Circulation Element Goal 5: Provide a system of freeways which maintains adequate travel times in and around the metropolitan area.
6. Circulation Element Goal 6: Provide a local street network that contributes to the quality and safety of residential neighborhoods and commercial districts.
7. Circulation Element Goal 7: Develop and maintain a circulation system that supports the land use plan shown in the general plan.
8. Circulation Element Policy 16: Require that truck access to commercial and industrial properties be designed to minimize impacts on adjacent residential parcels (I-14).
9. Circulation Element Policy 34: Minimize the impacts of land use development on the circulation system. Review all development plans, rezoning applications, and proposed general plan amendments with respect to their impact on the transportation system, and require revisions as necessary (I-26).
10. Conservation Element Goal 2 (Soils and Agriculture): Promote soil conservation and minimize development of prime agricultural land as defined by the following criteria: capability Class I and/or II irrigated soils, 80-100 Storie Index rating, gross crop return of $200 or more per acre per year, annual carrying capacity of 1 animal unit per acre per year.
11. Conservation Element Policy 3 (Soils and Agriculture): Protect areas designated for agricultural use, which include Class I and II agricultural soils having surface delivery water systems, from the encroachment of residential and commercial subdivision development activities (I-2).
12. Conservation Element Policy 9 (Soils and Agriculture): Protect prime agricultural lands against unplanned urban development by adopting agricultural zoning, agricultural land use designations, and by encouraging use of the Williamson Act and the Farmland Security Zone Program and policies that provide tax and economic incentives to ensure the long-term retention of agricultural lands (I-5).
13. Conservation Element Policy 17 (Soils and Agriculture): Sensitive subdivision design of lands near or adjacent to agricultural areas shall be conducted with consideration given to the impacts of nonagricultural uses on agricultural uses.
14. Conservation Element Policy 18 (Soils and Agriculture): To reduce the potential for conflicts between agricultural and nonagricultural uses, sensitive subdivision design of lands near or adjacent to agricultural areas shall be conducted including provisions for buffer zones (i.e., a road, canal, wall, easement, or setback).

Additionally, the EIR has not provided any analysis of the proposed project's consistency or inconsistency with the Metropolitan Bakersfield General Plan (MBGP). The EIR is inadequate as an informational document and a revised EIR must be prepared with a consistency analysis that considers the project's significant and unavoidable impacts in its analysis, including but not limited to the following goals and policies that were adopted for the purposes of avoiding or mitigating an environmental effect:

1. MBGP Land Use Element Goal 7: Establish a built environment which achieves a compatible functional and visual relationship among individual buildings and sites.
2. MBGP Land Use Element Goal 8: Target growth companies that meet clean air requirements, and create sustainable employment in jobs paying higher wages.
3. MBGP Land Use Element Policy 80: Assure that General Plan Amendment proposals for the conversion of designated agricultural lands to urban development occur in an orderly and logical manner giving full consideration to the effect on existing agricultural areas (see Chapter V, Conservation/Soils and Agriculture Policies 3 and 14) (I-15)
4. MBGP Circulation Element Policy 20: Prohibit parking on new arterials in incorporated areas. In unincorporated areas, prohibit parking when traffic studies warrant elimination. Allow parking on collectors and on residential streets (I-17).
5. MBGP Conservation Element Policy 2 (Soils and Agriculture): Review projects that propose subdividing or urbanizing prime agricultural land to ascertain how continued commercial agricultural production in the project vicinity will be affected (I-2).
6. MBGP Conservation Element Goal 1 (Air Quality). Promote air quality that is compatible with health, well being, and enjoyment of life by controlling point sources and minimizing vehicular trips to reduce air pollutants.
7. MBGP Conservation Element Policy 2 (Air Quality). Encourage land uses and land use practices which do not contribute significantly to air quality degradation.
8. MBGP Conservation Element Goal 3 (Air Quality). Reduce the amount of vehicular emissions in the planning area.
9. MBGP Conservation Element Policy 4 (Air Quality). Consider air pollution impacts when evaluating discretionary land use proposals. Considerations should include: a) Alternative access routes to reduce traffic congestion; b) Development phasing to match road capacities; c) Buffers including increase vegetation to increase emission dispersion and reduce impacts of gaseous or particulate matter on sensitive uses.

Further, it must be noted that the horizon year of the Metropolitan Bakersfield General Plan (MBGP) is 2020. Any development beyond year 2020 is not accounted for or analyzed by the MBGP and its EIR. The project is proposed four years after the horizon year of the MBGP and therefore is not accounted for in its growth projections or environmental analysis. Table 3-1: General Plan Land Use Designations within the MBGP EIR[15] lists that Industrial designated lands totaled 16,429 acres. The project's proposed GPA to the MBGP is an addition of 545 acres beyond the total in the MBGP EIR, and it was not accounted for in the growth projection to begin with. The EIR is inadequate as an informational document since the horizon year of the MBGP has passed and it has not provided a cumulative analysis of all light industrial projects approved since adoption of MBGP to accurately quantify the existing buildout scenario of the MBGP and/or the Kern County General Plan. A revised EIR must be prepared to include this information for analysis to adequately and accurately analyze all potentially significant environmental impacts. A finding of significance must be included because the project is not accounted for in the MBGP

[15] MBGP EIR https://psbweb.kerncounty.com/planning/pdfs/mbgp/MBGP_FPEIR.pdf

and/or Kern County General Plan growth projections and is beyond the 2020 horizon year analyzed in the MBGP Plan EIR.

The project proposes General Plan Amendment No. 9, Map 80 and General Plan Amendment No. 23, Map 81 to create Map Code 7.2 (Service Industrial) as a land use designation in both the Kern County General Plan and Metropolitan Bakersfield General Plan. The EIR has not provided any description of the proposed new Service Industrial land use designation. This does not comply with CEQA's with CEQA's requirements for adequate informational documents and meaningful disclosure (CEQA § 15121). The EIR must be revised to include a detailed description of the new Service Industrial land use designation and the associated pages, graphics, and text that will be inserted into the Kern County General Plan and Metropolitan Bakersfield General Plan.

Additionally, the EIR does not provide a consistency analysis with Kern COG'S 2022 Regional Transportation Plan (RTP)[16]. Due to errors in modeling and modeling without supporting evidence, as noted throughout this comment letter, and the EIR's determination that the project will have significant and unavoidable impacts to Air Quality, Greenhouse Gas Emissions, and Transportation, the proposed project is directly inconsistent with Goal 1 to improve the mobility of people and freight, Goal 3 to improve the reliability and safety of the transportation system, and Goal 5 to promote livable communities and satisfaction of consumers with the transportation system. The EIR must be revised to include finding of significance due to inconsistency with the 2022 RTP document.

4.13 Population and Housing

The EIR does not fully disclose the significant and unavoidable impacts of the proposed project. Kern COG adopted 2035 growth projections as part of the 2022 RTP, which are used by the EIR for analysis. Kern COG's Growth Forecast[17] notes that Metro Bakersfield will add 18,065 jobs between 2020 - 2035. Utilizing the EIR's calculation of 6,000 employees, the project represents 33.2% of the Metro Bakersfield's employment growth from 2020 - 2035. A single project accounting for this quantity of the projected employment growth within Metro Bakersfield over 15 years represents a significant amount of growth. The EIR must be revised to include this analysis, and also provide a cumulative analysis discussion of projects approved since 2020 and projects "in the pipeline" to determine if the project will exceed the employment and/or population growth forecast and present an accurate and adequate analysis of the proposed project's impacts to population and housing. For example, another recent industrial project known as Majestic

[16] Kern COG 2022 RTP https://www.kerncog.org/category/docs/rtp/
[17] Kern COG 2022 RTP Planning Assumptions https://www.kerncog.org/wp-content/uploads/2022/04/CHAPTER-3-PLANNING-ASSUMPTIONS-2022-RTP-1.pdf

Gateway Bakersfield[18] also required a GPA to the MBGP from General Commercial (GC) to Light Industrial (LI) and was anticipated to generate 1,512 employees; Westside Industrial Project[19] also required a GPA to the MBGP from RIA to Light Industrial (LI) and was anticipated to generate 1,830 employees. When considered with the proposed project, they will cumulatively generate 9,342 employees, which is 51.7% of Metro Bakersfield's employment growth forecast over 15 years accounted by only three recent industrial projects that both require changes in land use designations to proceed. This total increases exponentially when other industrial and commercial development activity is added to the calculation. A revised EIR must be prepared to include this information for analysis, and also provide a cumulative analysis discussion of projects approved since RTP adoption and projects "in the pipeline" to determine if the proposed project will exceed the employment/population growth forecasts by Kern COG, Kern County General Plan and/or the MBGP.

4.16 Transportation and Traffic

The VMT analysis in Appendix L relies upon the OPR 2018 CEQA Guidelines Technical Advisory and its statement that, "'vehicle miles traveled' refers to the amount and distance of automobile travel attributable to a project," where automobile refers to passenger vehicles, specifically cars and light trucks," (which is the OPR *interpretation* of PRC Section 15064.3) to conclude that the project will have less than significant impacts. However, the purpose of the OPR Technical Advisory document is purely advisory, stating in its introduction:

"The purpose of this document is to provide advice and recommendations, which agencies and other entities may use at their discretion. This document does not alter lead agency discretion in preparing environmental documents subject to CEQA. This document should not be construed as legal advice."

The OPR document is not a legal interpretation, court decision, or amendment to the CEQA statute that clarifies the definition of automobile. The term "automobile" is not defined in the CEQA statute and application of the OPR interpretation is speculative and does not provide an analysis of the "worst-case scenario" for environmental impacts. Widespread public understanding and perception indicates that trucks, including medium/heavy-duty truck/trailer trips associated with the industrial nature of warehouse operations, are automobiles. A revised EIR must be prepared to include all truck/trailer and operational delivery van activity for quantified VMT analysis. The operational nature of industrial/warehouse uses involves high rates of truck/trailer and delivery van VMT due to traveling from large regional distribution centers to smaller industrial parks and

[18] Majestic Gateway Bakersfield https://ceqanet.opr.ca.gov/2022030196/2
[19] Westside Industrial Project https://ceqanet.opr.ca.gov/Project/2023100467

then to their final delivery destinations. Once employees arrive at the industrial buildings for work, they will conduct their jobs by driving truck/trailer/delivery vans across the region as part of the daily operations as a fulfillment center, which will drastically increase project-generated VMT. The project's truck/trailer/delivery van activity is unable to utilize public transit or active transportation and it is misleading to the public and decision makers to exclude this activity from VMT analysis. A revised EIR must be prepared to reflect a quantified VMT analysis that includes all truck/trailer and delivery van activity to adequately and accurately analyze the potentially significant project transportation impacts.

Appendix L states that, "Model runs were prepared by KernCOG with and without the project for the years 2018 and 2042. The model is comprised of several Traffic Analysis Zones (TAZ) in which specific land use data is loaded. The Malibu Vineyards project is located within TAZs 2242, 2379 and 2442. Model runs were prepared by KernCOG with and without the project for the years 2018 and 2042, which allow the differentiation of the Malibu Vineyards project traffic within the TAZ and the region. The output from the KernCOG model provides a detailed breakdown of the number of employees and the trips and VMT by purpose for both the TAZ and county wide." However, the EIR nor Appendix L include the KernCOG modeling input/output sheets. This does not comply with CEQA's requirements for adequate informational documents and meaningful disclosure (CEQA § 15121 and 21003(b)). Incorporation by reference (CEQA § 15150 (f)) is not appropriate as the KernCOG modeling input/output sheets contribute directly to analysis of the problem at hand. A revised EIR must be prepared to include the KernCOG modeling input/output sheets for review, analysis, and comment by the public and decision makers.

The EIR has not adequately analyzed the project's potential to substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses; or the project's potential to result in inadequate emergency access. The EIR has excluded any specific truck/trailer turning exhibits from public review. There are no exhibits adequately depicting the available maneuvering and queueing space for trucks/trailers at the intersection of the project driveways and the adjacent streets. There are also no exhibits adequately depicting the onsite turning radius available for trucks maneuvering throughout the site. The EIR states that it provides a project-level analysis of all proposed buildings. Pursuant to CEQA Section 15146, the EIR must be more detailed in its analysis of all portions of the development. However, it does not provide project-specific analysis of the project's potential to substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses, or the project's potential to result in inadequate emergency access. The EIR must be revised to include a finding of significance as it has not provided any meaningful evidence or analysis to support a less than significant finding.

The EIR states that, "the proposed project would conform to Kern County standards for proposed project access and street design, impacts associated with increased hazards due to a design feature would be less than significant," and also states regarding emergency access that, "project design includes access roads, sufficient parking areas, and access driveways along the perimeter of the site, *expected* to provide adequate emergency access." This does not comply with CEQA's requirements for adequate informational documents and meaningful disclosure (CEQA § 15121 and 21003(b)). The EIR has not provided any details regarding the County requirements for project access, street design, or emergency access or meaningful analysis of the project's compliance or noncompliance with these requirements. Deferring this environmental analysis required by CEQA to the construction permitting phase is improper mitigation and does not comply with CEQA's requirement for meaningful disclosure and adequate informational documents, as well as the EIR's status as a Project EIR that must provide a project-level analysis in all areas of environmental analysis. A revised EIR must be prepared to include a finding of significance as the EIR has not provided any meaningful evidence to support a less than significant finding.

5.3 Irreversible Impacts and 5.4 Growth Inducement

A revised EIR must be prepared to include an accurate cumulative analysis discussion here to demonstrate the impact of the proposed project in a cumulative setting. The EIR does not include any information regarding the buildout conditions of the City's General Plan in order to provide an adequate and accurate environmental analysis. Notably, as the proposed project will create a new land use designation of Service Industrial, it was not accounted for in the General Plan EIR. The EIR must be revised to provide the horizon year of the City's current adopted General Plan, the total developable building floor area analyzed within the Industrial land use designations, and cumulative development since adoption of the General Plan, particularly since the EIR tiers from the General Plan EIR, and include a finding of significance as the project will exceed General Plan buildout for Industrially designated lands.

The EIR does not provide any meaningful analysis of the proposed project components, construction, or operations. For example, the EIR does not discuss that PG&E will construct a new electrical substation and distribution system to accommodate the power required by the proposed project or the new natural gas pressure reducing station to serve the project. Further, the EIR relies upon erroneous Energy modeling to determine that the project will meet sustainability requirements. As noted above, the EIR did not model the project's energy consumption in compliance with Title 24 modeling software. The EIR must be revised to include a finding of significance as it has not adequately or accurately analyzed the project's commitment of resources.

The EIR does not adequately discuss or and analyze the commitment of resources is not consistent with regional and local growth forecasts. Kern COG adopted 2035 growth projections as part of the 2022 RTP, which are used by the EIR for analysis. Kern COG's Growth Forecast[20] notes that Metro Bakersfield will add 18,065 jobs between 2020 - 2035. Utilizing the EIR's calculation of 6,000 employees, the project represents 33.2% of the Metro Bakersfield's employment growth from 2020 - 2035. A single project accounting for this quantity of the projected employment growth within Metro Bakersfield over 15 years represents a significant amount of growth. The EIR must be revised to include this analysis, and also provide a cumulative analysis discussion of projects approved since 2020 and projects "in the pipeline" to determine if the project will exceed the employment and/or population growth forecast and present an accurate and adequate analysis of the proposed project's impacts to population and housing. For example, another recent industrial project known as Majestic Gateway Bakersfield[21] also required a GPA to the MBGP from General Commercial (GC) to Light Industrial (LI) and was anticipated to generate 1,512 employees; Westside Industrial Project[22] also required a GPA to the MBGP from RIA to Light Industrial (LI) and was anticipated to generate 1,830 employees. When considered with the proposed project, they will cumulatively generate 9,342 employees, which is 51.7% of Metro Bakersfield's employment growth forecast over 15 years accounted by only three recent industrial projects that both require changes in land use designations to proceed. This total increases exponentially when other industrial and commercial development activity is added to the calculation. A revised EIR must be prepared to include this information for analysis, and also provide a cumulative analysis discussion of projects approved since RTP adoption and projects "in the pipeline" to determine if the proposed project will exceed the employment/population growth forecasts by Kern COG, Kern County General Plan and/or the MBGP.

Further, it must be noted that the horizon year of the Metropolitan Bakersfield General Plan (MBGP) is 2020. Any development beyond year 2020 is not accounted for or analyzed by the MBGP and its EIR. The project is proposed four years after the horizon year of the MBGP and therefore is not accounted for in its growth projections or environmental analysis. Table 3-1: General Plan Land Use Designations within the MBGP EIR[23] lists that Industrial designated lands totaled 16,429 acres. The project's proposed GPA to the MBGP is an addition of 545 acres beyond the total in the MBGP EIR, and it was not accounted for in the growth projection to begin with. The EIR is inadequate as an informational document since the horizon year of the MBGP has passed and it has not provided a cumulative analysis of all light industrial projects approved since

[20] Kern COG 2022 RTP Planning Assumptions https://www.kerncog.org/wp-content/uploads/2022/04/CHAPTER-3-PLANNING-ASSUMPTIONS-2022-RTP-1.pdf
[21] Majestic Gateway Bakersfield https://ceqanet.opr.ca.gov/2022030196/2
[22] Westside Industrial Project https://ceqanet.opr.ca.gov/Project/2023100467
[23] MBGP EIR https://psbweb.kerncounty.com/planning/pdfs/mbgp/MBGP_FPEIR.pdf

adoption of MBGP to accurately quantify the existing buildout scenario of the MBGP and/or the Kern County General Plan. A revised EIR must be prepared to include this information for analysis to adequately and accurately analyze all potentially significant environmental impacts. A finding of significance must be included because the project is not accounted for in the MBGP and/or Kern County General Plan growth projections and is beyond the 2020 horizon year analyzed in the MBGP Plan EIR.

The project proposes General Plan Amendment No. 9, Map 80 and General Plan Amendment No. 23, Map 81 to create Map Code 7.2 (Service Industrial) as a land use designation in both the Kern County General Plan and Metropolitan Bakersfield General Plan. The EIR has not provided any description of the proposed new Service Industrial land use designation. The EIR also does not discuss the growth inducing impacts or irreversible impacts of creating a new land use designation that could be applied to any other property in the County. The EIR must be revised to include a finding of significance.

6.0 Alternatives

The EIR is required to evaluate a reasonable range of alternatives to the proposed project which will avoid or substantially lessen any of the significant effects of the project (CEQA § 15126.6). The alternatives chosen for analysis include the CEQA required "No Project" alternative and only two others - Reduced Size Alternative and Alternative Site Location: Eastern Kern County Alternative. The EIR does not evaluate a reasonable range of alternatives as only two alternatives beyond the required No Project alternative are analyzed. The EIR does not include an alternative that meets the project objectives and also eliminates all of the project's significant and unavoidable impacts. The EIR must be revised to include analysis of a reasonable range of alternatives and foster informed decision making (CEQA § 15126.6). This must include alternatives such as development of the site with a project that reduces all of the proposed project's significant and unavoidable impacts to less than significant levels.

Conclusion

For the foregoing reasons, GSEJA believes the EIR is flawed and a revised EIR must be prepared for the proposed project and recirculated for public review. Golden State Environmental Justice Alliance requests to be added to the public interest list regarding any subsequent environmental documents, public notices, public hearings, and notices of determination for this project. Send all communications to Golden State Environmental Justice Alliance P.O. Box 79222 Corona, CA 92877.

Sincerely,



Gary Ho
Blum, Collins & Ho LLP

Attachments:
1. SWAPE Technical Analysis

SWAPE Technical Consultation, Data Analysis and Litigation Support for the Environment

2656 29th Street, Suite 201
Santa Monica, CA 90405

Matt Hagemann, P.G, C.Hg.
(949) 887-9013
mhagemann@swape.com

Paul E. Rosenfeld, PhD
(310) 795-2335
prosenfeld@swape.com

August 27, 2024

Gary Ho
Blum, Collins & Ho LLP
707 Wilshire Blvd, Ste. 4880
Los Angeles, CA 90017

Subject: Comments on the Malibu Vineyards Industrial Parkway Project (SCH No. 2022080056)

Dear Mr. Ho,

We have reviewed the July 2024 Draft Impact Environmental Report ("DEIR") for the Malibu Vineyards Industrial Parkway Project ("Project") located in the City of Bakersfield ("City"). The Project proposes to construct 8,907,446-square-feet ("SF") of office and warehouse space, 6,926 standard parking stalls, and 4,492 truck parking stalls on the 739-acre site.

Our review concludes that the DEIR fails to adequately evaluate the Project's air quality, health risk, and greenhouse gas impacts. As a result, emissions and health risk impacts associated with construction and operation of the proposed Project may be underestimated and inadequately addressed. A revised Environmental Impact Report ("EIR") should be prepared to adequately assess and mitigate the potential air quality, health risk, and greenhouse gas impacts that the project may have on the environment.

Air Quality

Unsupported Implementation of Operational Air Quality Mitigation

The DEIR estimates that the Project's operational reactive organic gases ("ROG"), nitrogen oxides ("NO_x"), and particulate matter 10 ("PM10") emissions would exceed the applicable San Joaquin Valley Air Pollution Control District ("SJVAPCD") thresholds before the implementation of mitigation measures (see excerpt below) (p. 4.3-36 - 37, Table 4.3-5).

Table 4.3-5: Post-Project (Operational) Emissions

Source	Annual Emissions (Tons/Year)[1]					
	ROG	NOx	CO	SOx	PM10	PM2.5
Unmitigated Operational Emissions						
Mobile Emissions	3.26	56.08	54.65	0.60	39.55	10.92
Aera Emissions	7.97	0.29	34.87	0.00	0.06	0.05
Energy Emissions	0.12	2.33	1.96	0.01	0.17	0.17
Total	**11.36**	**58.70**	**91.48**	**0.62**	**39.78**	**11.15**
Mitigated Operational Emissions						
Mobile Emissions	3.26	56.08	54.65	0.60	39.55	10.92
Aera Emissions	7.97	0.29	34.87	0.00	0.06	0.05
Energy Emissions	0.12	2.33	1.96	0.01	0.17	0.17
Total	**11.36**	**58.70**	**91.48**	**0.62**	**39.78**	**11.15**
Mitigated Operational Emissions (Mitigated with VERA)						
Final Operational Emissions	0	0	91.48	0.62	0	0
SJAPCD Significance Thresholds	10	10	100	27	15	15
Exceed Threshold?	No	No	No	No	No	No

Source: Trinity Consultants 2023 (Appendix D)

The DEIR incorporates Mitigation Measure ("MM") 4.3-4, which claims that the implementation of a Voluntary Emissions Reduction Agreement ("VERA") would reduce operational ROG, NOx, PM10, and particulate matter 2.5 ("PM2.5") emissions to zero, as demonstrated in the table above. MM 4.3-4 states:

> "Prior to issuance of any grading or construction permits, the Owner/Operator shall enter into a Developer Mitigation Agreement (DMA) (synonymous with a Voluntary Emissions Reduction Agreement) with the SJVAPCD. The DMA is to fully mitigate construction and operations criteria air emissions of project implementation for project vehicle and other mobile source emissions. The Owner/Operator shall pay fees to fully mitigate project emissions of NOx (oxides of nitrogen), ROG (reactive organic gases), PM10 (particulate matter of 10 microns or less in diameter), and PM2.5 (particulate matter of 2.5 microns or less in diameter) (collectively referred to as "designated criteria emissions") to avoid any net increase in these pollutants. The air quality mitigation fee shall be paid prior to the approval of any construction or grading approval, or payment plan as designated per the SJVAPCD" (DEIR, p. 4.3-40).

While we acknowledge the use of a VERA as a method of mitigation, the DEIR's reliance on MM 4.3-4 is unsubstantiated according to the California Environmental Quality Act ("CEQA") and SJVAPCD guidance. CEQA mandates that "where several measures are available to mitigate an impact, each should be discussed and the basis for selecting a particular measure should be identified. Formulation of

mitigation measures shall not be deferred until some future time." The specific details of a mitigation measure may be developed later, but only if the lead agency "(1) commits itself to the mitigation, (2) adopts specific performance standards the mitigation will achieve, and (3) identifies the type(s) of potential action(s) that can feasibly achieve that performance standard and that will be considered, analyzed, and potentially incorporated in the mitigation measure."[1] MM 4.3-4 fails to meet these criteria, as it lacks enforceable performance standards, clear implementation methods, and the level of detail required by CEQA.

Furthermore, CEQA highlights that "the mitigation measures for the [P]roject's long-term air quality impacts violate CEQA because they are vague, unenforceable and lack specific performance criteria."[2] This criticism is directly applicable to MM 4.3-4, as it defers the formulation of critical details to a future agreement without a commitment to specific, enforceable standards.

The SJVAPCD advises that "Lead Agencies should require the project proponent to negotiate a VERA with the District prior to the Lead Agency's final approval of the CEQA document."[3] This approach ensures that the Project's VERA provides the public with certainty that the air quality impacts will be fully mitigated. However, the DEIR fails to demonstrate this level of assurance, as it has not required a finalized VERA prior to its completion.

MM 4.3-4, therefore, fails to comply with CEQA requirements and the guidance of SJVAPCD. To adequately address the Project's air quality impacts, a revised EIR should be prepared that incorporates feasible mitigation strategies which are outlined under 'Feasible Mitigation Measures Available to Reduce Emissions' in this letter.

Disproportionate Health Risk Impacts of Warehouses on Surrounding Communities

Upon review of the DEIR, we have determined that the development of the proposed Project may contribute to disproportionate health risk impacts that warehouses pose on community members living, working, and going to school within the immediate area of the Project site.

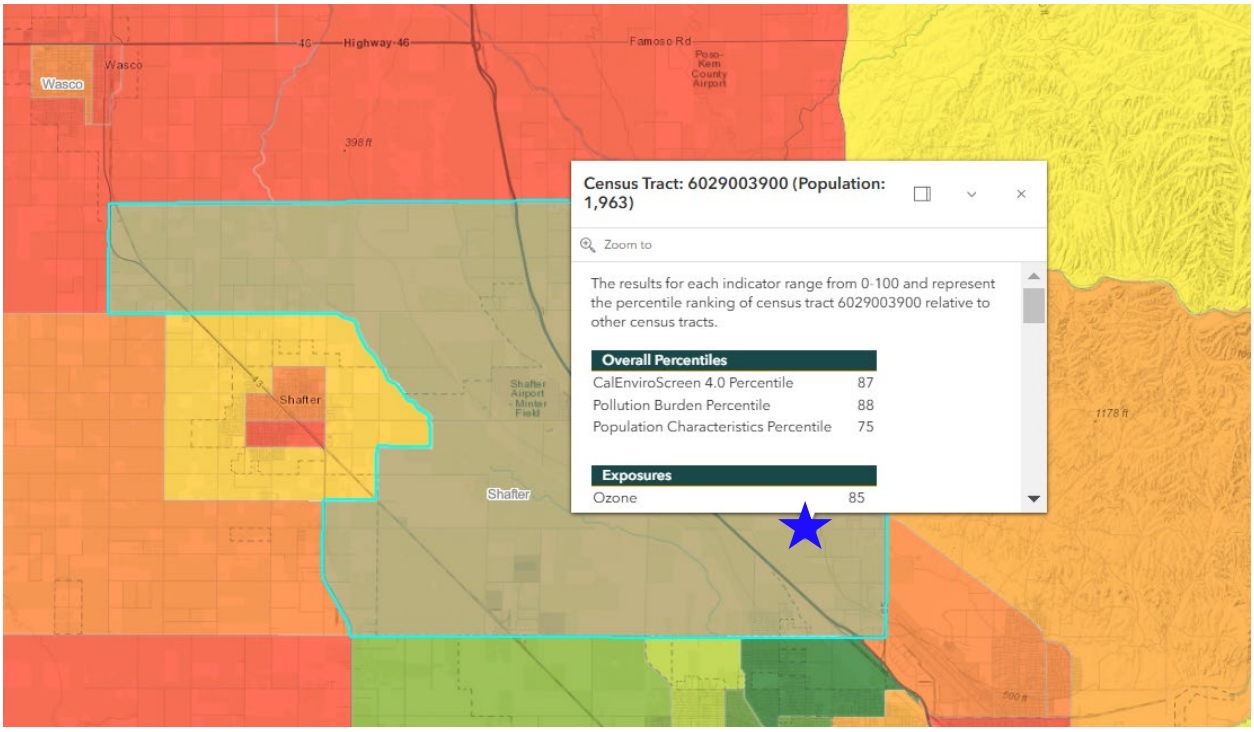
Kern County, the setting of the proposed Project, incorporates areas with disproportionately high pollution burdens compared to the rest of California. When using CalEnviroScreen 4.0, CalEPA's screening tool that ranks each census tract in the State for pollution and socioeconomic vulnerability, we

[1] "Section 15126.4 - Consideration and Discussion of Mitigation Measures Proposed to Minimize Significant Effects." CEQA Guidelines, August 2024, *available at:* https://casetext.com/regulation/california-code-of-regulations/title-14-natural-resources/division-6-resources-agency/chapter-3-guidelines-for-implementation-of-the-california-environmental-quality-act/article-9-contents-of-environmental-impact-reports/section-151264-consideration-and-discussion-of-mitigation-measures-proposed-to-minimize-significant-effects.

[2] "Sierra Club v. County of Fresno." Supreme Court of California, December 2018, *available at*: https://ceqaportal.org/decisions/1907/Sierra%20Club%20v.%20County%20of%20Fresno.pdf, p. 4 - 5.

[3] "Guidance for Assessing and Mitigating Air Quality Impacts." SJVAPCD, February 2015, *available at:* https://www.valleyair.org/transportation/GAMAQI-2015/FINAL-DRAFT-GAMAQI.PDF, p. 117.

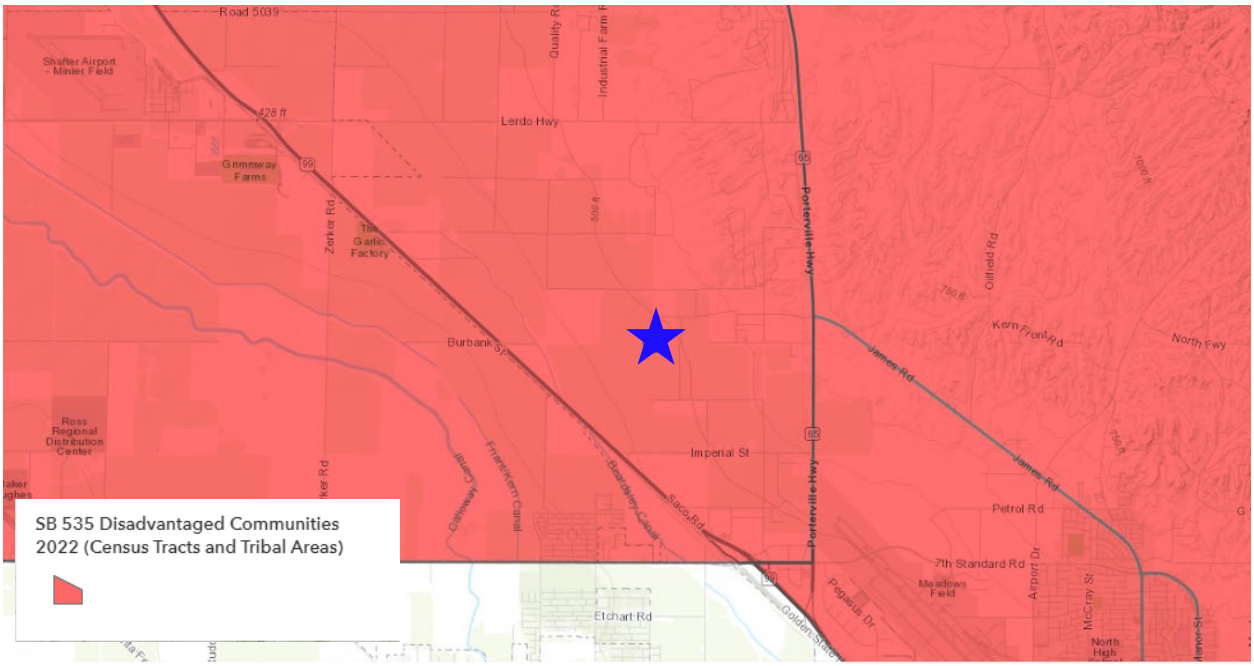
found that the Project's census tract is in the 88th percentile of most polluted census tracts in the State (see excerpt below).[4]



Additionally, according to CalEnviroScreen's SB 535 Disadvantaged Communities Map, the Project site is located in a designated disadvantaged community (see excerpt below).[5]

[4] "CalEnviroScreen 4.0." OEHHA, October 2021, *available at:* https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40, census tract #6071002204.

[5] "SB 535 Disadvantaged Communities (2022 Update)." California Environmental Protection Agency, *available at:* https://experience.arcgis.com/experience/1c21c53da8de48f1b946f3402fbae55c/page/SB-535-Disadvantaged-Communities/.



SB 535 provides funding for development projects that provide a benefit to disadvantaged communities. CalEPA has been given the responsibility for identifying those communities based on "geographic, socioeconomic, public health, and environmental hazard criteria."[6] As the Project site is within a disadvantaged community, and the Project's census tract exhibits a high cancer risk, the proposed Project would contribute to the disproportionate health impacts warehouses impose on nearby residents.

The proposed Project may exacerbate disproportionate health risks for community members within the immediate area, a concern underscored by the mandates of SB 1000. SB 1000, enacted to address environmental justice considerations, requires local governments to integrate environmental justice elements into their planning processes, particularly focusing on reducing health risks for disadvantaged communities.[7]

We recommend reevaluating the Project's cumulative health risks to more effectively align with California Department of Justice ("CA DOJ") guidelines and SB 1000 environmental justice requirements. Therefore, a revised EIR should be prepared to evaluate the Project's contribution to the disproportionate impacts that warehouses pose on the surrounding communities.

[6] "Final Designation of Disadvantaged Communities." California Environmental Protection Agency, *available at:* https://calepa.ca.gov/wp-content/uploads/sites/6/2022/05/Updated-Disadvantaged-Communities-Designation-DAC-May-2022-Eng.a.hp_-1.pdf?emrc=e05e10.

[7] "Environmental Justice in Local Land Use Planning." CA DOJ, *available at:* https://oag.ca.gov/environment/sb1000.

Diesel Particulate Matter Emissions Inadequately Evaluated

The DEIR conducts a health risk analysis ("HRA") evaluating impacts from exposure to diesel particulate matter ("DPM") emissions during Project construction and operation. DEIR estimates that the maximum cancer risk posed to nearby, existing residential sensitive receptors as a result of Project construction and operation would be 1.57 in one million (DEIR, p. 4-11, Table 4-5).

Table 4-5. Potential Maximum Impacts Predicted by HARP2

	Value	UTM East	UTM North
Excess Cancer Risk - Total	**1.57 in a million**	311667.9	3925652.6
Construction	1.56 in a million		
Operations	0.01 in a million		
Chronic Hazard Index - Total	**0.0034**		
Construction	0.0034		
Operations	2.17E-06		

The DEIR's evaluation of the Project's potential health risk impacts, as well as the subsequent less-than-significant impact conclusion, however, is unsupported as the DEIR fails to mention or provide the exposure assumptions for the HRA, such as the age sensitivity factors or fraction of time at home values. Until the DEIR substantiates the use of correct exposure assumptions, the HRA may underestimate the cancer risk posed to nearby, existing sensitive receptors because of Project construction. Furthermore, according to the *Risk Assessment Guidelines* provided by the Office of Environmental Health Hazard Assessment ("OEHHA"), the organization responsible for providing guidance on conducting HRAs in California, the DEIR's model should have used the following equation:[8]

A. Equation 8.2.4 A: $RISK_{inh\text{-}res} = DOSE_{air} \times CPF \times ASF \times ED/AT \times FAH$

7. $RISK_{inh\text{-}res}$ = Residential inhalation cancer risk
8. $DOSE_{air}$ = Daily inhalation dose (mg/kg-day)
9. CPF = Inhalation cancer potency factor ($mg/kg\text{-}day^{-1}$)
10. ASF = Age sensitivity factor for a specified age group (unitless)
11. ED = Exposure duration (in years) for a specified age group
12. AT = Averaging time for lifetime cancer risk (years)
13. FAH = Fraction of time spent at home (unitless)

The DEIR and associated documents fail to include a dose and risk equation to calculate the Project's construction cancer risks. Consequently, we cannot verify that the DEIR's HRA is accurate, and the Project's cancer risks may be underestimated.

[8] "Risk Assessment Guidelines Guidance Manual for Preparation of Health Risk Assessments." OEHHA, February 2015, available at: https://oehha.ca.gov/media/downloads/crnr/2015guidancemanual.pdf, p. 8-7 Equation 8.2.4.

Greenhouse Gas

Failure to Adequately Evaluate Greenhouse Gas Impacts

The DEIR estimates that the proposed Maximum Buildout Scenario and Scenario 2 would result in net annual greenhouse gas ("GHG") emissions of 77,974- metric tons of carbon dioxide equivalents per service population per year ("MT CO_2e/SP/year") (p. 4.7-21). (see excerpt below) (p. 4.8-19, Table 4.8-1).

Table 4.8-1: Estimated Annual GHG Emissions (MT/Year)

Source	Pollutant (tons/year)			
	CO_2	CH_4	N_2O	CO_2e
Mitigated Construction Emissions				
Total	23,021	0.53	1.15	23,383
Mitigated Operational Emissions				
Mobile Emissions	56,919	0.43	6.51	58,880
Area Emissions	130	0.01	0.00	131
Energy Emissions	11,879	1.74	0.19	11,978
Water Emissions	1,435	67.13	1.61	3,592
Waste Emissions	747	74.67	0.00	2,614
Total Project Operational Emissions	71,110	143.98	8.31	77,195
Annualized Construction Emissions	767	0.02	0.04	779
Project Emissions	**71,877**	**144.00**	**8.35**	**77,974**

*Note: 0.000 could represent <0.000 Per South Coast AQMD's Methodology
Source: Trinity Consultants 2024

As such, the DEIR concludes that the Project would result in a significant-and-unavoidable GHG impact, stating:

> "With implementation of Mitigation Measures MM 4.3-1, MM 4.3-3, MM 4.3-4, MM 4.8-1 and MM 4.8-2, impacts would be less than significant" (p. 4.8-21).

While we agree that the Project would result in a significant GHG impact, the DEIR's assertion that this impact is significant-and-unavoidable is unreliable. As previously discussed, according to CEQA Guidelines § 15096(g)(2):

> "When an updated EIR has been prepared for a project, the Responsible Agency shall not approve the project as proposed if the agency finds any feasible alternative or feasible mitigation measures within its powers that would substantially lessen or avoid any significant effect the project would have on the environment."

An impact can only be labeled as significant-and-unavoidable after all available, feasible mitigation measures are considered. While the DEIR incorporates GHG MM 4.3-1, MM 4.3-3, MM 4.3-4, MM 4.8-1 and MM 4.8-2, there are additional measures that the DEIR fails to consider (p. 4.8-21). To reduce the Project's GHG impacts to the maximum extent possible, additional feasible mitigation measures should be incorporated, such as those suggested in the section of this letter titled "Feasible Mitigation

Measures Available to Reduce Emissions." The Project should not be approved until a revised EIR is prepared, incorporating all feasible mitigation to reduce emissions to less-than-significant levels.

Mitigation

Feasible Mitigation Measures Available to Reduce Emissions

The DEIR is consequently required under CEQA to implement all feasible mitigation to reduce the Project's potential impacts. As demonstrated in the sections above, the Project would result in potentially significant air quality, health risk, and GHG impacts that should be mitigated further. In order to reduce the VOC, NOx, PM10, and GHG emissions associated with the Project, we recommend several mitigation measures.

The DEIR is consequently required under CEQA to implement all feasible mitigation to reduce the Project's potential impacts. As demonstrated in the sections above, the Project would result in potentially significant air quality and GHG impacts that should be mitigated further.

First, in order to reduce the volatile organic compound ("VOC") emissions associated with Project operation, we recommend the DEIR consider incorporating the following mitigation measure from Los Angeles County:[9]

- If paints and coatings with VOC content of 0 grams/liter to less than 10 grams/liter cannot be utilized, the developer shall avoid application of architectural coatings during the peak smog season: July, August, and September.

While the Project is not located in Los Angeles County, the use of low-VOC paints would nonetheless decrease the Project's significant VOC emissions.

Second, the EPA explains that NO_x emissions originate from "motor vehicle internal combustion engines and fossil fuel-fired electric utility and industrial boilers" and sources of PM_{10} emissions include "vehicle exhaust and road dust."[10,11] As NO_x and PM_{10} are emitted from mobile source engines we will provide mitigation measure that apply to both pollutants. In order to reduce the NO_x and PM_{10} emissions associated with Project operation, we recommend the DEIR consider incorporating several mitigation measures (see list below).

The California Air Resources Board ("CARB") recommends: [12]

[9] "Mitigation Monitoring and Reporting Program." Los Angeles County Housing Element Update Program EIR. August 2021, *available at*: https://planning.lacounty.gov/wp-content/uploads/2023/07/Housing_final-peir-mitigation-monitoring.pdf.
[10] "Proposed Revisions to the National Ambient Air Quality Standards for Nitrogen Dioxide." EPA, July 2009, *available at*: https://www.gpo.gov/fdsys/pkg/FR-2009-07-15/pdf/E9-15944.pdf.
[11] "Particle Pollution and your Health." EPA, September 2003, *available at*: https://www.airnow.gov/publications/air-quality-andyour-health/partical-pollution-and-your-health/.
[12] "Recommended Air Pollution Emission Reduction Measures for Warehouses and Distribution Centers." CARB, August 2023, *available at*: https://ww2.arb.ca.gov/sites/default/files/2023-08/CARB%20Comments%20-%20NOP%20for%20the%20%20Oak%20Valley%20North%20Project%20DEIR.pdf; Attachment A, p. 5 – 8.

- Requiring all TRUs entering the project-site be plug-in capable;
- Requiring all service equipment (e.g., yard hostlers, yard equipment, forklifts, and pallet jacks) used within the project site to be zero-emission;
- Requiring future tenants to exclusively use zero-emission light and medium-duty delivery trucks and vans;
- Including contractual language in tenant lease agreements restricting trucks and support equipment from idling longer than two minutes while on site; and
- Requiring the installing of vegetative walls or other effective barriers that separate loading docks and people living or working nearby.

The CA DOJ recommends:[13]

- Posting both interior- and exterior-facing signs, including signs directed at all dock and delivery areas, identifying idling restrictions and contact information to report violations to CARB, the local air district, and the building manager; and
- Sequent future projects under the Proposed Project shall install Level 2 EV charging stations in 15% of all parking spaces for multi-family developments and pre-wiring to allow for a Level 2 EV charging stations in all single-family residential garages.

Third, in order to reduce the GHG emissions associated with the Project, we recommend several mitigation measures (see list below).

SCAG's 2020 RTP/SCS PEIR's Greenhouse Gas Project Level Mitigation Measures ("PMM-GHG-1") recommends:

- Measures that encourage transit use, carpooling, bike-share and car-share programs, active transportation, and parking strategies, including, but not limited to the following:
    - Promote transit-active transportation coordinated strategies,
    - Improve or increase access to transit,
    - Increase access to common goods and services, such as groceries, schools, and day care,
    - Incorporate the neighborhood electric vehicle network,
    - Provide traffic calming measures,
    - Limit or eliminate park supply,
    - Provide parking cash-out programs, and
    - Implement or provide access to commute reduction program;
- Improving transit access to rail and bus routes by incentives for construction and transit facilities within developments, and/or providing dedicated shuttle service to transit stations;
- Designate a percentage of parking spaces for ride-sharing vehicles or high-occupancy vehicles, and provide adequate passenger loading and unloading for those vehicles;
- Implement preferential parking permit program;

[13] "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act." State of California Department of Justice, September 2022, *available at*: https://oag.ca.gov/system/files/media/warehouse-best-practices.pdf, p. 8 – 10.

- Encourage telecommuting and alternative work schedules, such as:
    - Staggered starting times,
    - Flexible schedules, and
    - Compressed work weeks;
- Implement commute trip reduction marketing, such as:
    - New employee orientation of trip reduction and alternative mode options,
    - Event promotions, and
    - Publications;
- Price workplace parking, such as:
    - Explicitly charging for parking for its employees,
    - Implementing above market rate pricing,
    - Validating parking only for invited guests,
    - Not providing employee parking and transportation allowances, and
    - Educating employees about available alternatives; and
- Adopting employer trip reduction measures to reduce employee trips such as vanpool and carpool programs, providing end-of-trip facilities, and telecommuting programs including but not limited to measures that:
    - Provide car-sharing, bike sharing, and ride-sharing programs,
    - Provide transit passes,
    - Shift single occupancy vehicle trips to carpooling or vanpooling, for example providing ride-matching services,
    - Provide incentives or subsidies that increase that use of modes other than single-occupancy vehicle, and
    - Provide on-site amenities at places of work, such as priority parking for carpools and vanpools, secure bike parking, and showers and locker rooms.

CARB recommends: [14]

- Ensuring the cleanest possible construction practices and equipment are used. This includes eliminating the idling of diesel-powered equipment and providing the necessary infrastructure (e.g., electrical hookups) to support zero and near-zero equipment and tools;
- Requiring all off-road diesel-powered equipment used during construction to be equipped with Tier 4 or cleaner engines, except for specialized construction equipment in which Tier 4 engines are not available. In place of Tier 4 engines, off-road equipment can incorporate retrofits, such that, emission reductions achieved are equal to or exceed that of a Tier 4 engine;
- Requiring all heavy-duty trucks entering the construction site during the grading and building construction phases be model year 2014 or later. All heavy-duty haul trucks should also meet CARB's lowest optional low-oxides of nitrogen (NOx) standard starting in the year 2022; and
- Require all construction equipment and fleets to be in compliance with all current air quality regulations.

[14] *Ibid.* p. 5 – 8.

The CA DOJ recommends: [15]

- Oversizing electrical rooms by 25 percent or providing a secondary electrical room to accommodate future expansion of electric vehicle charging capability;
- Requiring all stand-by emergency generators to be powered by a non-diesel fuel;
- Meeting CalGreen Tier 2 green building standards, including all provisions related to designated parking for clean air vehicles, electric vehicle charging, and bicycle parking;
- Constructing zero-emission truck charging/fueling stations proportional to the number of dock doors at the project;
- Running conduit to designated locations for future electric truck charging stations;
- Constructing and maintaining electric light-duty vehicle charging stations proportional to the number of employee parking spaces;
- Running conduit to an additional proportion of employee parking spaces for a future increase in the number of electric light-duty charging stations;
- Requiring facility operators to train managers and employees on efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks;
- Posting signs at every truck exit driveway providing directional information to the truck route;
- Requiring that every tenant train its staff in charge of keeping vehicle records in diesel technologies and compliance with CARB regulations, by attending CARB-approved courses. Also require facility operators to maintain records on-site demonstrating compliance and make records available for inspection by the local jurisdiction, air district, and state upon request;
- Requiring tenants to enroll in the United States Environmental Protection Agency's SmartWay program, and requiring tenants who own, operate, or hire trucking carriers with more than 100 trucks to use carriers that are SmartWay carriers; and
- Providing tenants with information on incentive programs, such as the Carl Moyer Program and Voucher Incentive Program, to upgrade their fleets.

SCAQMD staff recommends: [16]

- Utilizing only Energy Star heating, cooling, and lighting devices and appliances.

CEQA Guidelines 15126.4 (c)(3) include "[o]ffsite measures, including offsets that are not otherwise required, to mitigate a project's emissions" as an option for GHG mitigation.[17] An example of this was in the case of the Oakland Sports and Mixed-Use Project, where off-site reduction measures in the

[15] *Ibid.* p. 9 – 10.
[16] "Draft Environmental Impact Report (EIR) for the Proposed CADO Menifee Industrial Warehouse Project (Proposed Project)." SCAQMD, April 2024, *available at*: https://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2024/april-2024/RVC240313-05.pdf?sfvrsn=8, p. 3.
[17] "Cal. Code Regs. tit. 14 § 15126.4." CEQA Guidelines, May 2024, *available at*: https://casetext.com/regulation/california-code-of-regulations/title-14-natural-resources/division-6-resources-agency/chapter-3-guidelines-for-implementation-of-the-california-environmental-quality-act/article-9-contents-of-environmental-impact-reports/section-151264-consideration-and-discussion-of-mitigation-measures-proposed-to-minimize-significant-effects.

neighboring communities were recommended.[18] We recommend consideration of local carbon offset programs to reduce the Project's GHG impacts as a measure of last result.

As demonstrated above, we have provided several mitigation measures that would reduce Project-related ROG, NO_x and $PM_{10,}$ and GHG emissions developed from sources including SCAG, the DOJ and others. These measures offer a cost-effective, feasible way to incorporate lower-emitting design features into the proposed Project, which subsequently reduce emissions released during Project construction and operation.

A revised EIR should be prepared that includes all feasible mitigation measures, as well as updated air quality and GHG analyses to ensure that the necessary mitigation measures are implemented to reduce emissions to the maximum extent feasible. The revised EIR should also demonstrate a commitment to the implementation of these measures prior to Project approval, to ensure that the Project's potentially significant emissions are reduced to the maximum extent possible.

Disclaimer

SWAPE has received limited discovery regarding this project. Additional information may become available in the future; thus, we retain the right to revise or amend this report when additional information becomes available. Our professional services have been performed using that degree of care and skill ordinarily exercised, under similar circumstances, by reputable environmental consultants practicing in this or similar localities at the time of service. No other warranty, expressed or implied, is made as to the scope of work, work methodologies and protocols, site conditions, analytical testing results, and findings presented. This report reflects efforts which were limited to information that was reasonably accessible at the time of the work, and may contain informational gaps, inconsistencies, or otherwise be incomplete due to the unavailability or uncertainty of information obtained or provided by third parties.

Sincerely,



Matt Hagemann, P.G., C.Hg.



Paul E. Rosenfeld, Ph.D.

[18] "Cal. Pub. Resources Code § 21168.6.7." 2023, *available at*: https://casetext.com/statute/california-codes/california-public-resources-code/division-13-environmental-quality/chapter-6-limitations/section-2116867-oakland-sports-and-mixed-use-project-conditions-for-approval-certification-of-project-for-streamlining.

Attachment A: Matt Hagemann CV
Attachment B: Paul Rosenfeld CV

SWAPE Technical Consultation, Data Analysis and Litigation Support for the Environment

2656 29th Street, Suite 201
Santa Monica, CA 90405

Matt Hagemann, P.G, C.Hg.
(949) 887-9013
mhagemann@swape.com

Matthew F. Hagemann, P.G., C.Hg., QSD, QSP

Geologic and Hydrogeologic Characterization
Investigation and Remediation Strategies
Litigation Support and Testifying Expert
Industrial Stormwater Compliance
CEQA Review

Education:

M.S. Degree, Geology, California State University Los Angeles, Los Angeles, CA, 1984.
B.A. Degree, Geology, Humboldt State University, Arcata, CA, 1982.

Professional Certifications:

California Professional Geologist
California Certified Hydrogeologist
Qualified SWPPP Developer and Practitioner

Professional Experience:

Matt has 30 years of experience in environmental policy, contaminant assessment and remediation, stormwater compliance, and CEQA review. He spent nine years with the U.S. EPA in the RCRA and Superfund programs and served as EPA's Senior Science Policy Advisor in the Western Regional Office where he identified emerging threats to groundwater from perchlorate and MTBE. While with EPA, Matt also served as a Senior Hydrogeologist in the oversight of the assessment of seven major military facilities undergoing base closure. He led numerous enforcement actions under provisions of the Resource Conservation and Recovery Act (RCRA) and directed efforts to improve hydrogeologic characterization and water quality monitoring. For the past 15 years, as a founding partner with SWAPE, Matt has developed extensive client relationships and has managed complex projects that include consultation as an expert witness and a regulatory specialist, and a manager of projects ranging from industrial stormwater compliance to CEQA review of impacts from hazardous waste, air quality and greenhouse gas emissions.

Positions Matt has held include:

- Founding Partner, Soil/Water/Air Protection Enterprise (SWAPE) (2003 – present);
- Geology Instructor, Golden West College, 2010 – 2104, 2017;
- Senior Environmental Analyst, Komex H2O Science, Inc. (2000 -- 2003);

- Executive Director, Orange Coast Watch (2001 – 2004);
- Senior Science Policy Advisor and Hydrogeologist, U.S. Environmental Protection Agency (1989–1998);
- Hydrogeologist, National Park Service, Water Resources Division (1998 – 2000);
- Adjunct Faculty Member, San Francisco State University, Department of Geosciences (1993 – 1998);
- Instructor, College of Marin, Department of Science (1990 – 1995);
- Geologist, U.S. Forest Service (1986 – 1998); and
- Geologist, Dames & Moore (1984 – 1986).

Senior Regulatory and Litigation Support Analyst:

With SWAPE, Matt's responsibilities have included:

- Lead analyst and testifying expert in the review of over 300 environmental impact reports and negative declarations since 2003 under CEQA that identify significant issues with regard to hazardous waste, water resources, water quality, air quality, greenhouse gas emissions, and geologic hazards. Make recommendations for additional mitigation measures to lead agencies at the local and county level to include additional characterization of health risks and implementation of protective measures to reduce worker exposure to hazards from toxins and Valley Fever.
- Stormwater analysis, sampling and best management practice evaluation at more than 100 industrial facilities.
- Expert witness on numerous cases including, for example, perfluorooctanoic acid (PFOA) contamination of groundwater, MTBE litigation, air toxins at hazards at a school, CERCLA compliance in assessment and remediation, and industrial stormwater contamination.
- Technical assistance and litigation support for vapor intrusion concerns.
- Lead analyst and testifying expert in the review of environmental issues in license applications for large solar power plants before the California Energy Commission.
- Manager of a project to evaluate numerous formerly used military sites in the western U.S.
- Manager of a comprehensive evaluation of potential sources of perchlorate contamination in Southern California drinking water wells.
- Manager and designated expert for litigation support under provisions of Proposition 65 in the review of releases of gasoline to sources drinking water at major refineries and hundreds of gas stations throughout California.

With Komex H2O Science Inc., Matt's duties included the following:

- Senior author of a report on the extent of perchlorate contamination that was used in testimony by the former U.S. EPA Administrator and General Counsel.
- Senior researcher in the development of a comprehensive, electronically interactive chronology of MTBE use, research, and regulation.
- Senior researcher in the development of a comprehensive, electronically interactive chronology of perchlorate use, research, and regulation.
- Senior researcher in a study that estimates nationwide costs for MTBE remediation and drinking water treatment, results of which were published in newspapers nationwide and in testimony against provisions of an energy bill that would limit liability for oil companies.
- Research to support litigation to restore drinking water supplies that have been contaminated by MTBE in California and New York.

- Expert witness testimony in a case of oil production-related contamination in Mississippi.
- Lead author for a multi-volume remedial investigation report for an operating school in Los Angeles that met strict regulatory requirements and rigorous deadlines.
- Development of strategic approaches for cleanup of contaminated sites in consultation with clients and regulators.

Executive Director:

As Executive Director with Orange Coast Watch, Matt led efforts to restore water quality at Orange County beaches from multiple sources of contamination including urban runoff and the discharge of wastewater. In reporting to a Board of Directors that included representatives from leading Orange County universities and businesses, Matt prepared issue papers in the areas of treatment and disinfection of wastewater and control of the discharge of grease to sewer systems. Matt actively participated in the development of countywide water quality permits for the control of urban runoff and permits for the discharge of wastewater. Matt worked with other nonprofits to protect and restore water quality, including Surfrider, Natural Resources Defense Council and Orange County CoastKeeper as well as with business institutions including the Orange County Business Council.

Hydrogeology:

As a Senior Hydrogeologist with the U.S. Environmental Protection Agency, Matt led investigations to characterize and cleanup closing military bases, including Mare Island Naval Shipyard, Hunters Point Naval Shipyard, Treasure Island Naval Station, Alameda Naval Station, Moffett Field, Mather Army Airfield, and Sacramento Army Depot. Specific activities were as follows:

- Led efforts to model groundwater flow and contaminant transport, ensured adequacy of monitoring networks, and assessed cleanup alternatives for contaminated sediment, soil, and groundwater.
- Initiated a regional program for evaluation of groundwater sampling practices and laboratory analysis at military bases.
- Identified emerging issues, wrote technical guidance, and assisted in policy and regulation development through work on four national U.S. EPA workgroups, including the Superfund Groundwater Technical Forum and the Federal Facilities Forum.

At the request of the State of Hawaii, Matt developed a methodology to determine the vulnerability of groundwater to contamination on the islands of Maui and Oahu. He used analytical models and a GIS to show zones of vulnerability, and the results were adopted and published by the State of Hawaii and County of Maui.

As a hydrogeologist with the EPA Groundwater Protection Section, Matt worked with provisions of the Safe Drinking Water Act and NEPA to prevent drinking water contamination. Specific activities included the following:

- Received an EPA Bronze Medal for his contribution to the development of national guidance for the protection of drinking water.
- Managed the Sole Source Aquifer Program and protected the drinking water of two communities through designation under the Safe Drinking Water Act. He prepared geologic reports, conducted

public hearings, and responded to public comments from residents who were very concerned about the impact of designation.

- Reviewed a number of Environmental Impact Statements for planned major developments, including large hazardous and solid waste disposal facilities, mine reclamation, and water transfer.

Matt served as a hydrogeologist with the RCRA Hazardous Waste program. Duties were as follows:

- Supervised the hydrogeologic investigation of hazardous waste sites to determine compliance with Subtitle C requirements.
- Reviewed and wrote "part B" permits for the disposal of hazardous waste.
- Conducted RCRA Corrective Action investigations of waste sites and led inspections that formed the basis for significant enforcement actions that were developed in close coordination with U.S. EPA legal counsel.
- Wrote contract specifications and supervised contractor's investigations of waste sites.

With the National Park Service, Matt directed service-wide investigations of contaminant sources to prevent degradation of water quality, including the following tasks:

- Applied pertinent laws and regulations including CERCLA, RCRA, NEPA, NRDA, and the Clean Water Act to control military, mining, and landfill contaminants.
- Conducted watershed-scale investigations of contaminants at parks, including Yellowstone and Olympic National Park.
- Identified high-levels of perchlorate in soil adjacent to a national park in New Mexico and advised park superintendent on appropriate response actions under CERCLA.
- Served as a Park Service representative on the Interagency Perchlorate Steering Committee, a national workgroup.
- Developed a program to conduct environmental compliance audits of all National Parks while serving on a national workgroup.
- Co-authored two papers on the potential for water contamination from the operation of personal watercraft and snowmobiles, these papers serving as the basis for the development of nation-wide policy on the use of these vehicles in National Parks.
- Contributed to the Federal Multi-Agency Source Water Agreement under the Clean Water Action Plan.

Policy:

Served senior management as the Senior Science Policy Advisor with the U.S. Environmental Protection Agency, Region 9.

Activities included the following:

- Advised the Regional Administrator and senior management on emerging issues such as the potential for the gasoline additive MTBE and ammonium perchlorate to contaminate drinking water supplies.
- Shaped EPA's national response to these threats by serving on workgroups and by contributing to guidance, including the Office of Research and Development publication, Oxygenates in Water: Critical Information and Research Needs.
- Improved the technical training of EPA's scientific and engineering staff.
- Earned an EPA Bronze Medal for representing the region's 300 scientists and engineers in negotiations with the Administrator and senior management to better integrate scientific

principles into the policy-making process.
- Established national protocol for the peer review of scientific documents.

Geology:

With the U.S. Forest Service, Matt led investigations to determine hillslope stability of areas proposed for timber harvest in the central Oregon Coast Range. Specific activities were as follows:

- Mapped geology in the field, and used aerial photographic interpretation and mathematical models to determine slope stability.
- Coordinated his research with community members who were concerned with natural resource protection.
- Characterized the geology of an aquifer that serves as the sole source of drinking water for the city of Medford, Oregon.

As a consultant with Dames and Moore, Matt led geologic investigations of two contaminated sites (later listed on the Superfund NPL) in the Portland, Oregon, area and a large hazardous waste site in eastern Oregon. Duties included the following:

- Supervised year-long effort for soil and groundwater sampling.
- Conducted aquifer tests.
- Investigated active faults beneath sites proposed for hazardous waste disposal.

Teaching:

From 1990 to 1998, Matt taught at least one course per semester at the community college and university levels:

- At San Francisco State University, held an adjunct faculty position and taught courses in environmental geology, oceanography (lab and lecture), hydrogeology, and groundwater contamination.
- Served as a committee member for graduate and undergraduate students.
- Taught courses in environmental geology and oceanography at the College of Marin.

Matt is currently a part time geology instructor at Golden West College in Huntington Beach, California where he taught from 2010 to 2014 and in 2017.

Invited Testimony, Reports, Papers and Presentations:

Hagemann, M.F., 2008. Disclosure of Hazardous Waste Issues under CEQA. Presentation to the Public Environmental Law Conference, Eugene, Oregon.

Hagemann, M.F., 2008. Disclosure of Hazardous Waste Issues under CEQA. Invited presentation to U.S. EPA Region 9, San Francisco, California.

Hagemann, M.F., 2005. Use of Electronic Databases in Environmental Regulation, Policy Making and Public Participation. Brownfields 2005, Denver, Coloradao.

Hagemann, M.F., 2004. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in Nevada and the Southwestern U.S. Presentation to a meeting of the American Groundwater Trust, Las Vegas, NV (served on conference organizing committee).

Hagemann, M.F., 2004. Invited testimony to a California Senate committee hearing on air toxins at schools in Southern California, Los Angeles.

Brown, A., Farrow, J., Gray, A. and **Hagemann, M.**, 2004. An Estimate of Costs to Address MTBE Releases from Underground Storage Tanks and the Resulting Impact to Drinking Water Wells. Presentation to the Ground Water and Environmental Law Conference, National Groundwater Association.

Hagemann, M.F., 2004. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in Arizona and the Southwestern U.S. Presentation to a meeting of the American Groundwater Trust, Phoenix, AZ (served on conference organizing committee).

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in the Southwestern U.S. Invited presentation to a special committee meeting of the National Academy of Sciences, Irvine, CA.

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River. Invited presentation to a tribal EPA meeting, Pechanga, CA.

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River. Invited presentation to a meeting of tribal repesentatives, Parker, AZ.

Hagemann, M.F., 2003. Impact of Perchlorate on the Colorado River and Associated Drinking Water Supplies. Invited presentation to the Inter-Tribal Meeting, Torres Martinez Tribe.

Hagemann, M.F., 2003. The Emergence of Perchlorate as a Widespread Drinking Water Contaminant. Invited presentation to the U.S. EPA Region 9.

Hagemann, M.F., 2003. A Deductive Approach to the Assessment of Perchlorate Contamination. Invited presentation to the California Assembly Natural Resources Committee.

Hagemann, M.F., 2003. Perchlorate: A Cold War Legacy in Drinking Water. Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. From Tank to Tap: A Chronology of MTBE in Groundwater. Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. A Chronology of MTBE in Groundwater and an Estimate of Costs to Address Impacts to Groundwater. Presentation to the annual meeting of the Society of Environmental Journalists.

Hagemann, M.F., 2002. An Estimate of the Cost to Address MTBE Contamination in Groundwater (and Who Will Pay). Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. An Estimate of Costs to Address MTBE Releases from Underground Storage Tanks and the Resulting Impact to Drinking Water Wells. Presentation to a meeting of the U.S. EPA and State Underground Storage Tank Program managers.

Hagemann, M.F., 2001. From Tank to Tap: A Chronology of MTBE in Groundwater. Unpublished report.

Hagemann, M.F., 2001. Estimated Cleanup Cost for MTBE in Groundwater Used as Drinking Water. Unpublished report.

Hagemann, M.F., 2001. Estimated Costs to Address MTBE Releases from Leaking Underground Storage Tanks. Unpublished report.

Hagemann, M.F., and VanMouwerik, M., 1999. Potential Water Quality Concerns Related to Snowmobile Usage. Water Resources Division, National Park Service, Technical Report.

VanMouwerik, M. and **Hagemann, M.F**. 1999, Water Quality Concerns Related to Personal Watercraft Usage. Water Resources Division, National Park Service, Technical Report.

Hagemann, M.F., 1999, Is Dilution the Solution to Pollution in National Parks? The George Wright Society Biannual Meeting, Asheville, North Carolina.

Hagemann, M.F., 1997, The Potential for MTBE to Contaminate Groundwater. U.S. EPA Superfund Groundwater Technical Forum Annual Meeting, Las Vegas, Nevada.

Hagemann, M.F., and Gill, M., 1996, Impediments to Intrinsic Remediation, Moffett Field Naval Air Station, Conference on Intrinsic Remediation of Chlorinated Hydrocarbons, Salt Lake City.

Hagemann, M.F., Fukunaga, G.L., 1996, The Vulnerability of Groundwater to Anthropogenic Contaminants on the Island of Maui, Hawaii. Hawaii Water Works Association Annual Meeting, Maui, October 1996.

Hagemann, M. F., Fukanaga, G. L., 1996, Ranking Groundwater Vulnerability in Central Oahu, Hawaii. Proceedings, Geographic Information Systems in Environmental Resources Management, Air and Waste Management Association Publication VIP-61.

Hagemann, M.F., 1994. Groundwater Characterization and Cleanup at Closing Military Bases in California. Proceedings, California Groundwater Resources Association Meeting.

Hagemann, M.F. and Sabol, M.A., 1993. Role of the U.S. EPA in the High Plains States Groundwater Recharge Demonstration Program. Proceedings, Sixth Biennial Symposium on the Artificial Recharge of Groundwater.

Hagemann, M.F., 1993. U.S. EPA Policy on the Technical Impracticability of the Cleanup of DNAPL-contaminated Groundwater. California Groundwater Resources Association Meeting.

Hagemann, M.F., 1992. Dense Nonaqueous Phase Liquid Contamination of Groundwater: An Ounce of Prevention... Proceedings, Association of Engineering Geologists Annual Meeting, v. 35.

Other Experience:

Selected as subject matter expert for the California Professional Geologist licensing examinations, 2009-2011.

SWAPE Technical Consultation, Data Analysis and Litigation Support for the Environment

SOIL WATER AIR PROTECTION ENTERPRISE
2656 29th Street, Suite 201
Santa Monica, California 90405
Attn: Paul Rosenfeld, Ph.D.
Mobil: (310) 795-2335
Office: (310) 452-5555
Fax: (310) 452-5550
Email: prosenfeld@swape.com

Paul Rosenfeld, Ph.D.

Chemical Fate and Transport & Air Dispersion Modeling

Principal Environmental Chemist

Risk Assessment & Remediation Specialist

Education

Ph.D. Soil Chemistry, University of Washington, 1999. Dissertation on volatile organic compound filtration.

M.S. Environmental Science, U.C. Berkeley, 1995. Thesis on organic waste economics.

B.A. Environmental Studies, U.C. Santa Barbara, 1991. Focus on wastewater treatment.

Professional Experience

Dr. Rosenfeld has over 25 years of experience conducting environmental investigations and risk assessments for evaluating impacts to human health, property, and ecological receptors. His expertise focuses on the fate and transport of environmental contaminants, human health risk, exposure assessment, and ecological restoration. Dr. Rosenfeld has evaluated and modeled emissions from oil spills, landfills, boilers and incinerators, process stacks, storage tanks, confined animal feeding operations, industrial, military and agricultural sources, unconventional oil drilling operations, and locomotive and construction engines. His project experience ranges from monitoring and modeling of pollution sources to evaluating impacts of pollution on workers at industrial facilities and residents in surrounding communities. Dr. Rosenfeld has also successfully modeled exposure to contaminants distributed by water systems and via vapor intrusion.

Dr. Rosenfeld has investigated and designed remediation programs and risk assessments for contaminated sites containing lead, heavy metals, mold, bacteria, particulate matter, petroleum hydrocarbons, chlorinated solvents, pesticides, radioactive waste, dioxins and furans, semi- and volatile organic compounds, PCBs, PAHs, creosote, perchlorate, asbestos, per- and poly-fluoroalkyl substances (PFOA/PFOS), unusual polymers, fuel oxygenates (MTBE), among other pollutants. Dr. Rosenfeld also has experience evaluating greenhouse gas emissions from various projects and is an expert on the assessment of odors from industrial and agricultural sites, as well as the evaluation of odor nuisance impacts and technologies for abatement of odorous emissions. As a principal scientist at SWAPE, Dr. Rosenfeld directs air dispersion modeling and exposure assessments. He has served as an expert witness and testified about pollution sources causing nuisance and/or personal injury at sites and has testified as an expert witness on numerous cases involving exposure to soil, water and air contaminants from industrial, railroad, agricultural, and military sources.

Professional History:

Soil Water Air Protection Enterprise (SWAPE); 2003 to present; Principal and Founding Partner
UCLA School of Public Health; 2007 to 2011; Lecturer (Assistant Researcher)
UCLA School of Public Health; 2003 to 2006; Adjunct Professor
UCLA Environmental Science and Engineering Program; 2002-2004; Doctoral Intern Coordinator
UCLA Institute of the Environment, 2001-2002; Research Associate
Komex H_2O Science, 2001 to 2003; Senior Remediation Scientist
National Groundwater Association, 2002-2004; Lecturer
San Diego State University, 1999-2001; Adjunct Professor
Anteon Corp., San Diego, 2000-2001; Remediation Project Manager
Ogden (now Amec), San Diego, 2000-2000; Remediation Project Manager
Bechtel, San Diego, California, 1999 – 2000; Risk Assessor
King County, Seattle, 1996 – 1999; Scientist
James River Corp., Washington, 1995-96; Scientist
Big Creek Lumber, Davenport, California, 1995; Scientist
Plumas Corp., California and USFS, Tahoe 1993-1995; Scientist
Peace Corps and World Wildlife Fund, St. Kitts, West Indies, 1991-1993; Scientist

Publications:

Rosenfeld P. E., Spaeth K., Hallman R., Bressler R., Smith, G., (2022) Cancer Risk and Diesel Exhaust Exposure Among Railroad Workers. *Water Air Soil Pollution.* **233,** 171.

Remy, L.L., Clay T., Byers, V., **Rosenfeld P. E.** (2019) Hospital, Health, and Community Burden After Oil Refinery Fires, Richmond, California 2007 and 2012. *Environmental Health.* 18:48

Simons, R.A., Seo, Y. **Rosenfeld, P**., (2015) Modeling the Effect of Refinery Emission On Residential Property Value. Journal of Real Estate Research. 27(3):321-342

Chen, J. A, Zapata A. R., Sutherland A. J., Molmen, D.R., Chow, B. S., Wu, L. E., **Rosenfeld, P. E.,** Hesse, R. C., (2012) Sulfur Dioxide and Volatile Organic Compound Exposure To A Community In Texas City Texas Evaluated Using Aermod and Empirical Data. *American Journal of Environmental Science*, 8(6), 622-632.

Rosenfeld, P.E. & Feng, L. (2011). *The Risks of Hazardous Waste.* Amsterdam: Elsevier Publishing.

Cheremisinoff, N.P., & **Rosenfeld, P.E.** (2011). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Agrochemical Industry*, Amsterdam: Elsevier Publishing.

Gonzalez, J., Feng, L., Sutherland, A., Waller, C., Sok, H., Hesse, R., **Rosenfeld, P.** (2010). PCBs and Dioxins/Furans in Attic Dust Collected Near Former PCB Production and Secondary Copper Facilities in Sauget, IL. *Procedia Environmental Sciences*. 113–125.

Feng, L., Wu, C., Tam, L., Sutherland, A.J., Clark, J.J., **Rosenfeld, P.E.** (2010). Dioxin and Furan Blood Lipid and Attic Dust Concentrations in Populations Living Near Four Wood Treatment Facilities in the United States. *Journal of Environmental Health*. 73(6), 34-46.

Cheremisinoff, N.P., & **Rosenfeld, P.E.** (2010). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Wood and Paper Industries.* Amsterdam: Elsevier Publishing.

Cheremisinoff, N.P., & **Rosenfeld, P.E.** (2009). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Petroleum Industry*. Amsterdam: Elsevier Publishing.

Wu, C., Tam, L., Clark, J., **Rosenfeld, P**. (2009). Dioxin and furan blood lipid concentrations in populations living near four wood treatment facilities in the United States. *WIT Transactions on Ecology and the Environment, Air Pollution,* 123 (17), 319-327.

Tam L. K.., Wu C. D., Clark J. J. and **Rosenfeld, P.E.** (2008). A Statistical Analysis Of Attic Dust And Blood Lipid Concentrations Of Tetrachloro-p-Dibenzodioxin (TCDD) Toxicity Equivalency Quotients (TEQ) In Two Populations Near Wood Treatment Facilities. *Organohalogen Compounds*, 70, 002252-002255.

Tam L. K.., Wu C. D., Clark J. J. and **Rosenfeld, P.E.** (2008). Methods For Collect Samples For Assessing Dioxins And Other Environmental Contaminants In Attic Dust: A Review. *Organohalogen Compounds*, 70, 000527-000530.

Hensley, A.R. A. Scott, J. J. J. Clark, **Rosenfeld, P.E.** (2007). Attic Dust and Human Blood Samples Collected near a Former Wood Treatment Facility. *Environmental Research*. 105, 194-197.

Rosenfeld, P.E., J. J. J. Clark, A. R. Hensley, M. Suffet. (2007). The Use of an Odor Wheel Classification for Evaluation of Human Health Risk Criteria for Compost Facilities. *Water Science & Technology* 55(5), 345-357.

Rosenfeld, P. E., M. Suffet. (2007). The Anatomy Of Odour Wheels For Odours Of Drinking Water, Wastewater, Compost And The Urban Environment. *Water Science & Technology* 55(5), 335-344.

Sullivan, P. J. Clark, J.J.J., Agardy, F. J., **Rosenfeld, P.E.** (2007). *Toxic Legacy, Synthetic Toxins in the Food, Water, and Air in American Cities.* Boston Massachusetts: Elsevier Publishing

Rosenfeld, P.E., and Suffet I.H. (2004). Control of Compost Odor Using High Carbon Wood Ash. *Water Science and Technology*. 49(9),171-178.

Rosenfeld P. E., J.J. Clark, I.H. (Mel) Suffet (2004). The Value of An Odor-Quality-Wheel Classification Scheme For The Urban Environment. *Water Environment Federation's Technical Exhibition and Conference (WEFTEC) 2004.* New Orleans, October 2-6, 2004.

Rosenfeld, P.E., and Suffet, I.H. (2004). Understanding Odorants Associated With Compost, Biomass Facilities, and the Land Application of Biosolids. *Water Science and Technology*. 49(9), 193-199.

Rosenfeld, P.E., and Suffet I.H. (2004). Control of Compost Odor Using High Carbon Wood Ash, *Water Science and Technology*, 49(9), 171-178.

Rosenfeld, P. E., Grey, M. A., Sellew, P. (2004). Measurement of Biosolids Odor and Odorant Emissions from Windrows, Static Pile and Biofilter. *Water Environment Research*. 76(4), 310-315.

Rosenfeld, P.E., Grey, M and Suffet, M. (2002). Compost Demonstration Project, Sacramento California Using High-Carbon Wood Ash to Control Odor at a Green Materials Composting Facility. *Integrated Waste Management Board Public Affairs Office*, Publications Clearinghouse (MS–6), Sacramento, CA Publication #442-02-008.

Rosenfeld, P.E., and C.L. Henry. (2001). Characterization of odor emissions from three different biosolids. *Water Soil and Air Pollution*. 127(1-4), 173-191.

Rosenfeld, P.E., and Henry C. L., (2000). Wood ash control of odor emissions from biosolids application. *Journal of Environmental Quality.* 29, 1662-1668.

Rosenfeld, P.E., C.L. Henry and D. Bennett. (2001). Wastewater dewatering polymer affect on biosolids odor emissions and microbial activity. *Water Environment Research*. 73(4), 363-367.

Rosenfeld, P.E., and C.L. Henry. (2001). Activated Carbon and Wood Ash Sorption of Wastewater, Compost, and Biosolids Odorants. *Water Environment Research*, 73, 388-393.

Rosenfeld, P.E., and Henry C. L., (2001). High carbon wood ash effect on biosolids microbial activity and odor. *Water Environment Research*. 131(1-4), 247-262.

Chollack, T. and **P. Rosenfeld. (**1998). Compost Amendment Handbook For Landscaping. Prepared for and distributed by the City of Redmond, Washington State.

Rosenfeld, P. E. (1992). The Mount Liamuiga Crater Trail. *Heritage Magazine of St. Kitts*, 3(2).

Rosenfeld, P. E. (1993). High School Biogas Project to Prevent Deforestation On St. Kitts. *Biomass Users Network*, 7(1).

Rosenfeld, P. E. (1998). Characterization, Quantification, and Control of Odor Emissions From Biosolids Application To Forest Soil. Doctoral Thesis. University of Washington College of Forest Resources.

Rosenfeld, P. E. (1994). Potential Utilization of Small Diameter Trees on Sierra County Public Land. Masters thesis reprinted by the Sierra County Economic Council. Sierra County, California.

Rosenfeld, P. E. (1991). How to Build a Small Rural Anaerobic Digester & Uses Of Biogas In The First And Third World. Bachelors Thesis. University of California.

Presentations:

Rosenfeld, P.E., "The science for Perfluorinated Chemicals (PFAS): What makes remediation so hard?" Law Seminars International, (May 9-10, 2018) 800 Fifth Avenue, Suite 101 Seattle, WA.

Rosenfeld, P.E., Sutherland, A; Hesse, R.; Zapata, A. (October 3-6, 2013). Air dispersion modeling of volatile organic emissions from multiple natural gas wells in Decatur, TX. *44th Western Regional Meeting, American Chemical Society.* Lecture conducted from Santa Clara, CA.

Sok, H.L.; Waller, C.C.; Feng, L.; Gonzalez, J.; Sutherland, A.J.; Wisdom-Stack, T.; Sahai, R.K.; Hesse, R.C.; **Rosenfeld, P.E.** (June 20-23, 2010). Atrazine: A Persistent Pesticide in Urban Drinking Water. *Urban Environmental Pollution*. Lecture conducted from Boston, MA.

Feng, L.; Gonzalez, J.; Sok, H.L.; Sutherland, A.J.; Waller, C.C.; Wisdom-Stack, T.; Sahai, R.K.; La, M.; Hesse, R.C.; **Rosenfeld, P.E.** (June 20-23, 2010). Bringing Environmental Justice to East St. Louis, Illinois. *Urban Environmental Pollution.* Lecture conducted from Boston, MA.

Rosenfeld, P.E. (April 19-23, 2009). Perfluoroctanoic Acid (PFOA) and Perfluoroactane Sulfonate (PFOS) Contamination in Drinking Water From the Use of Aqueous Film Forming Foams (AFFF) at Airports in the United States. *2009 Ground Water Summit and 2009 Ground Water Protection Council Spring Meeting*, Lecture conducted from Tuscon, AZ.

Rosenfeld, P.E. (April 19-23, 2009). Cost to Filter Atrazine Contamination from Drinking Water in the United States" Contamination in Drinking Water From the Use of Aqueous Film Forming Foams (AFFF) at Airports in the United States. *2009 Ground Water Summit and 2009 Ground Water Protection Council Spring Meeting*. Lecture conducted from Tuscon, AZ.

Wu, C., Tam, L., Clark, J., **Rosenfeld, P**. (20-22 July, 2009). Dioxin and furan blood lipid concentrations in populations living near four wood treatment facilities in the United States. Brebbia, C.A. and Popov, V., eds., *Air Pollution XVII: Proceedings of the Seventeenth International Conference on Modeling, Monitoring and Management of Air Pollution*. Lecture conducted from Tallinn, Estonia.

Rosenfeld, P. E. (October 15-18, 2007). Moss Point Community Exposure To Contaminants From A Releasing Facility. *The 23rd Annual International Conferences on Soils Sediment and Water.* Platform lecture conducted from University of Massachusetts, Amherst MA.

Rosenfeld, P. E. (October 15-18, 2007). The Repeated Trespass of Tritium-Contaminated Water Into A Surrounding Community Form Repeated Waste Spills From A Nuclear Power Plant. *The 23rd Annual International Conferences on Soils Sediment and Water*. Platform lecture conducted from University of Massachusetts, Amherst MA.

Rosenfeld, P. E. (October 15-18, 2007). Somerville Community Exposure To Contaminants From Wood Treatment Facility Emissions. The *23rd Annual International Conferences on Soils Sediment and Water*. Lecture conducted from University of Massachusetts, Amherst MA.

Rosenfeld P. E. (March 2007). Production, Chemical Properties, Toxicology, & Treatment Case Studies of 1,2,3-Trichloropropane (TCP). *The Association for Environmental Health and Sciences (AEHS) Annual Meeting*. Lecture conducted from San Diego, CA.

Rosenfeld P. E. (March 2007). Blood and Attic Sampling for Dioxin/Furan, PAH, and Metal Exposure in Florala, Alabama. *The AEHS Annual Meeting.* Lecture conducted from San Diego, CA.

Hensley A.R., Scott, A., **Rosenfeld P.E.,** Clark, J.J.J. (August 21 – 25, 2006). Dioxin Containing Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility. *The 26th International Symposium on Halogenated Persistent Organic Pollutants – DIOXIN2006*. Lecture conducted from Radisson SAS Scandinavia Hotel in Oslo Norway.

Hensley A.R., Scott, A., **Rosenfeld P.E.,** Clark, J.J.J. (November 4-8, 2006). Dioxin Containing Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility. *APHA 134 Annual Meeting & Exposition.* Lecture conducted from Boston Massachusetts.

Paul Rosenfeld Ph.D. (October 24-25, 2005). Fate, Transport and Persistence of PFOA and Related Chemicals. Mealey's C8/PFOA. *Science, Risk & Litigation Conference.* Lecture conducted from The Rittenhouse Hotel, Philadelphia, PA.

Paul Rosenfeld Ph.D. (September 19, 2005). Brominated Flame Retardants in Groundwater: Pathways to Human Ingestion, *Toxicology and Remediation PEMA Emerging Contaminant Conference*. Lecture conducted from Hilton Hotel, Irvine California.

Paul Rosenfeld Ph.D. (September 19, 2005). Fate, Transport, Toxicity, And Persistence of 1,2,3-TCP. *PEMA Emerging Contaminant Conference.* Lecture conducted from Hilton Hotel in Irvine, California.

Paul Rosenfeld Ph.D. (September 26-27, 2005). Fate, Transport and Persistence of PDBEs. *Mealey's Groundwater Conference.* Lecture conducted from Ritz Carlton Hotel, Marina Del Ray, California.

Paul Rosenfeld Ph.D. (June 7-8, 2005). Fate, Transport and Persistence of PFOA and Related Chemicals. *International Society of Environmental Forensics: Focus On Emerging Contaminants*. Lecture conducted from Sheraton Oceanfront Hotel, Virginia Beach, Virginia.

Paul Rosenfeld Ph.D. (July 21-22, 2005). Fate Transport, Persistence and Toxicology of PFOA and Related Perfluorochemicals. *2005 National Groundwater Association Ground Water And Environmental Law Conference*. Lecture conducted from Wyndham Baltimore Inner Harbor, Baltimore Maryland.

Paul Rosenfeld Ph.D. (July 21-22, 2005). Brominated Flame Retardants in Groundwater: Pathways to Human Ingestion, Toxicology and Remediation. *2005 National Groundwater Association Ground Water and Environmental Law Conference.* Lecture conducted from Wyndham Baltimore Inner Harbor, Baltimore Maryland.

Paul Rosenfeld, Ph.D. and James Clark Ph.D. and Rob Hesse R.G. (May 5-6, 2004). Tert-butyl Alcohol Liability and Toxicology, A National Problem and Unquantified Liability. *National Groundwater Association. Environmental Law Conference*. Lecture conducted from Congress Plaza Hotel, Chicago Illinois.

Paul Rosenfeld, Ph.D. (March 2004). Perchlorate Toxicology. *Meeting of the American Groundwater Trust*. Lecture conducted from Phoenix Arizona.

Hagemann, M.F., **Paul Rosenfeld, Ph.D.** and Rob Hesse (2004). Perchlorate Contamination of the Colorado River. *Meeting of tribal representatives*. Lecture conducted from Parker, AZ.

Paul Rosenfeld, Ph.D. (April 7, 2004). A National Damage Assessment Model For PCE and Dry Cleaners. *Drycleaner Symposium. California Ground Water Association*. Lecture conducted from Radison Hotel, Sacramento, California.

Rosenfeld, P. E., Grey, M., (June 2003) Two stage biofilter for biosolids composting odor control. *Seventh International In Situ And On Site Bioremediation Symposium Battelle Conference* Orlando, FL.

Paul Rosenfeld, Ph.D. and James Clark Ph.D. (February 20-21, 2003) Understanding Historical Use, Chemical Properties, Toxicity and Regulatory Guidance of 1,4 Dioxane. *National Groundwater Association. Southwest Focus Conference. Water Supply and Emerging Contaminants*.. Lecture conducted from Hyatt Regency Phoenix Arizona.

Paul Rosenfeld, Ph.D. (February 6-7, 2003). Underground Storage Tank Litigation and Remediation. *California CUPA Forum*. Lecture conducted from Marriott Hotel, Anaheim California.

Paul Rosenfeld, Ph.D. (October 23, 2002) Underground Storage Tank Litigation and Remediation. *EPA Underground Storage Tank Roundtable*. Lecture conducted from Sacramento California.

Rosenfeld, P.E. and Suffet, M. (October 7- 10, 2002). Understanding Odor from Compost, *Wastewater and Industrial Processes. Sixth Annual Symposium On Off Flavors in the Aquatic Environment. International Water Association*. Lecture conducted from Barcelona Spain.

Rosenfeld, P.E. and Suffet, M. (October 7- 10, 2002). Using High Carbon Wood Ash to Control Compost Odor. *Sixth Annual Symposium On Off Flavors in the Aquatic Environment. International Water Association*. Lecture conducted from Barcelona Spain.

Rosenfeld, P.E. and Grey, M. A. (September 22-24, 2002). Biocycle Composting For Coastal Sage Restoration. *Northwest Biosolids Management Association*. Lecture conducted from Vancouver Washington..

Rosenfeld, P.E. and Grey, M. A. (November 11-14, 2002). Using High-Carbon Wood Ash to Control Odor at a Green Materials Composting Facility. *Soil Science Society Annual Conferenc*e. Lecture conducted from Indianapolis, Maryland.

Rosenfeld. P.E. (September 16, 2000). Two stage biofilter for biosolids composting odor control. *Water Environment Federation.* Lecture conducted from Anaheim California.

Rosenfeld. P.E. (October 16, 2000). Wood ash and biofilter control of compost odor. *Biofest.* Lecture conducted from Ocean Shores, California.

Rosenfeld, P.E. (2000). Bioremediation Using Organic Soil Amendments. *California Resource Recovery Association*. Lecture conducted from Sacramento California.

Rosenfeld, P.E., C.L. Henry, R. Harrison. (1998). Oat and Grass Seed Germination and Nitrogen and Sulfur Emissions Following Biosolids Incorporation With High-Carbon Wood-Ash. *Water Environment Federation 12th Annual Residuals and Biosolids Management Conference Proceedings*. Lecture conducted from Bellevue Washington.

Rosenfeld, P.E., and C.L. Henry. (1999). An evaluation of ash incorporation with biosolids for odor reduction. *Soil Science Society of America*. Lecture conducted from Salt Lake City Utah.

Rosenfeld, P.E., C.L. Henry, R. Harrison. (1998). Comparison of Microbial Activity and Odor Emissions from Three Different Biosolids Applied to Forest Soil. *Brown and Caldwell.* Lecture conducted from Seattle Washington.

Rosenfeld, P.E., C.L. Henry. (1998). Characterization, Quantification, and Control of Odor Emissions from Biosolids Application To Forest Soil. *Biofest.* Lecture conducted from Lake Chelan, Washington.

Rosenfeld, P.E, C.L. Henry, R. Harrison. (1998). Oat and Grass Seed Germination and Nitrogen and Sulfur Emissions Following Biosolids Incorporation With High-Carbon Wood-Ash. Water Environment Federation 12th Annual Residuals and Biosolids Management Conference Proceedings. Lecture conducted from Bellevue Washington.

Rosenfeld, P.E., C.L. Henry, R. B. Harrison, and R. Dills. (1997). Comparison of Odor Emissions From Three Different Biosolids Applied to Forest Soil. *Soil Science Society of America*. Lecture conducted from Anaheim California.

Teaching Experience:

UCLA Department of Environmental Health (Summer 2003 through 20010) Taught Environmental Health Science 100 to students, including undergrad, medical doctors, public health professionals and nurses. Course focused on the health effects of environmental contaminants.

National Ground Water Association, Successful Remediation Technologies. Custom Course in Sante Fe, New Mexico. May 21, 2002. Focused on fate and transport of fuel contaminants associated with underground storage tanks.

National Ground Water Association; Successful Remediation Technologies Course in Chicago Illinois. April 1, 2002. Focused on fate and transport of contaminants associated with Superfund and RCRA sites.

California Integrated Waste Management Board, April and May, 2001. Alternative Landfill Caps Seminar in San Diego, Ventura, and San Francisco. Focused on both prescriptive and innovative landfill cover design.

UCLA Department of Environmental Engineering, February 5, 2002. Seminar on Successful Remediation Technologies focusing on Groundwater Remediation.

University Of Washington, Soil Science Program, Teaching Assistant for several courses including: Soil Chemistry, Organic Soil Amendments, and Soil Stability.

U.C. Berkeley, Environmental Science Program Teaching Assistant for Environmental Science 10.

Academic Grants Awarded:

California Integrated Waste Management Board. $41,000 grant awarded to UCLA Institute of the Environment. Goal: To investigate effect of high carbon wood ash on volatile organic emissions from compost. 2001.

Synagro Technologies, Corona California: $10,000 grant awarded to San Diego State University.
Goal: investigate effect of biosolids for restoration and remediation of degraded coastal sage soils. 2000.

King County, Department of Research and Technology, Washington State. $100,000 grant awarded to University of Washington: Goal: To investigate odor emissions from biosolids application and the effect of polymers and ash on VOC emissions. 1998.

Northwest Biosolids Management Association, Washington State. $20,000 grant awarded to investigate effect of polymers and ash on VOC emissions from biosolids. 1997.

James River Corporation, Oregon: $10,000 grant was awarded to investigate the success of genetically engineered Poplar trees with resistance to round-up. 1996.

United State Forest Service, Tahoe National Forest: $15,000 grant was awarded to investigating fire ecology of the Tahoe National Forest. 1995.

Kellogg Foundation, Washington D.C. $500 grant was awarded to construct a large anaerobic digester on St. Kitts in West Indies. 1993

Deposition and/or Trial Testimony:

In the Superior Court of the State of California, County of San Bernardino
Billy Wildrick, Plaintiff vs. BNSF Railway Company
Case No. CIVDS1711810
Rosenfeld Deposition 10-17-2022

In the State Court of Bibb County, State of Georgia
Richard Hutcherson, Plaintiff vs Norfolk Southern Railway Company
Case No. 10-SCCV-092007
Rosenfeld Deposition 10-6-2022

In the Civil District Court of the Parish of Orleans, State of Louisiana
Millard Clark, Plaintiff vs. Dixie Carriers, Inc. et al.
Case No. 2020-03891
Rosenfeld Deposition 9-15-2022

In The Circuit Court of Livingston County, State of Missouri, Circuit Civil Division
Shirley Ralls, Plaintiff vs. Canadian Pacific Railway and Soo Line Railroad
Case No. 18-LV-CC0020
Rosenfeld Deposition 9-7-2022

In The Circuit Court of the 13th Judicial Circuit Court, Hillsborough County, Florida Civil Division
Jonny C. Daniels, Plaintiff vs. CSX Transportation Inc.
Case No. 20-CA-5502
Rosenfeld Deposition 9-1-2022

In The Circuit Court of St. Louis County, State of Missouri
Kieth Luke et. al. Plaintiff vs. Monsanto Company et. al.
Case No. 19SL-CC03191
Rosenfeld Deposition 8-25-2022

In The Circuit Court of the 13th Judicial Circuit Court, Hillsborough County, Florida Civil Division
Jeffery S. Lamotte, Plaintiff vs. CSX Transportation Inc.
Case No. NO. 20-CA-0049
Rosenfeld Deposition 8-22-2022

In State of Minnesota District Court, County of St. Louis Sixth Judicial District
Greg Bean, Plaintiff vs. Soo Line Railroad Company
Case No. 69-DU-CV-21-760
Rosenfeld Deposition 8-17-2022

In United States District Court Western District of Washington at Tacoma, Washington
John D. Fitzgerald Plaintiff vs. BNSF
Case No. 3:21-cv-05288-RJB
Rosenfeld Deposition 8-11-2022

In Circuit Court of the Sixth Judicial Circuit, Macon Illinois
Rocky Bennyhoff Plaintiff vs. Norfolk Southern
Case No. 20-L-56
Rosenfeld Deposition 8-3-2022

In Court of Common Pleas, Hamilton County Ohio
Joe Briggins Plaintiff vs. CSX
Case No. A2004464
Rosenfeld Deposition 6-17-2022

In the Superior Court of the State of California, County of Kern
George LaFazia vs. BNSF Railway Company.
Case No. BCV-19-103087
Rosenfeld Deposition 5-17-2022

In the Circuit Court of Cook County Illinois
Bobby Earles vs. Penn Central et. al.
Case No. 2020-L-000550
Rosenfeld Deposition 4-16-2022

In United States District Court Easter District of Florida
Albert Hartman Plaintiff vs. Illinois Central
Case No. 2:20-cv-1633
Rosenfeld Deposition 4-4-2022

In the Circuit Court of the 4th Judicial Circuit, in and For Duval County, Florida
Barbara Steele vs. CSX Transportation
Case No.16-219-Ca-008796
Rosenfeld Deposition 3-15-2022

In United States District Court Easter District of New York
Romano et al. vs. Northrup Grumman Corporation
Case No. 16-cv-5760
Rosenfeld Deposition 3-10-2022

In the Circuit Court of Cook County Illinois
Linda Benjamin vs. Illinois Central
Case No. No. 2019 L 007599
Rosenfeld Deposition 1-26-2022

In the Circuit Court of Cook County Illinois
Donald Smith vs. Illinois Central
Case No. No. 2019 L 003426
Rosenfeld Deposition 1-24-2022

In the Circuit Court of Cook County Illinois
Jan Holeman vs. BNSF
Case No. 2019 L 000675
Rosenfeld Deposition 1-18-2022

In the State Court of Bibb County State of Georgia
Dwayne B. Garrett vs. Norfolk Southern
Case No. 20-SCCV-091232
Rosenfeld Deposition 11-10-2021

In the Circuit Court of Cook County Illinois
Joseph Ruepke vs. BNSF
Case No. 2019 L 007730
Rosenfeld Deposition 11-5-2021

In the United States District Court For the District of Nebraska
Steven Gillett vs. BNSF
Case No. 4:20-cv-03120
Rosenfeld Deposition 10-28-2021

In the Montana Thirteenth District Court of Yellowstone County
James Eadus vs. Soo Line Railroad and BNSF
Case No. DV 19-1056
Rosenfeld Deposition 10-21-2021

In the Circuit Court Of The Twentieth Judicial Circuit, St Clair County, Illinois
Martha Custer et al.cvs. Cerro Flow Products, Inc.
Case No. 0i9-L-2295
Rosenfeld Deposition 5-14-2021
Trial October 8-4-2021

In the Circuit Court of Cook County Illinois
Joseph Rafferty vs. Consolidated Rail Corporation and National Railroad Passenger Corporation d/b/a AMTRAK,
Case No. 18-L-6845
Rosenfeld Deposition 6-28-2021

In the United States District Court For the Northern District of Illinois
Theresa Romcoe vs. Northeast Illinois Regional Commuter Railroad Corporation d/b/a METRA Rail
Case No. 17-cv-8517
Rosenfeld Deposition 5-25-2021

In the Superior Court of the State of Arizona In and For the Cunty of Maricopa
Mary Tryon et al. vs. The City of Pheonix v. Cox Cactus Farm, L.L.C., Utah Shelter Systems, Inc.
Case No. CV20127-094749
Rosenfeld Deposition 5-7-2021

In the United States District Court for the Eastern District of Texas Beaumont Division
Robinson, Jeremy et al vs. CNA Insurance Company et al.
Case No. 1:17-cv-000508
Rosenfeld Deposition 3-25-2021

In the Superior Court of the State of California, County of San Bernardino
Gary Garner, Personal Representative for the Estate of Melvin Garner vs. BNSF Railway Company.
Case No. 1720288
Rosenfeld Deposition 2-23-2021

In the Superior Court of the State of California, County of Los Angeles, Spring Street Courthouse
Benny M Rodriguez vs. Union Pacific Railroad, A Corporation, et al.
Case No. 18STCV01162
Rosenfeld Deposition 12-23-2020

In the Circuit Court of Jackson County, Missouri
Karen Cornwell, Plaintiff, vs. Marathon Petroleum, LP, Defendant.
Case No. 1716-CV10006
Rosenfeld Deposition 8-30-2019

In the United States District Court For The District of New Jersey
Duarte et al, Plaintiffs, vs. United States Metals Refining Company et. al. Defendant.
Case No. 2:17-cv-01624-ES-SCM
Rosenfeld Deposition 6-7-2019

In the United States District Court of Southern District of Texas Galveston Division
M/T Carla Maersk vs. Conti 168., Schiffahrts-GMBH & Co. Bulker KG MS "Conti Perdido" Defendant.
Case No. 3:15-CV-00106 consolidated with 3:15-CV-00237
Rosenfeld Deposition 5-9-2019

In The Superior Court of the State of California In And For The County Of Los Angeles – Santa Monica
Carole-Taddeo-Bates et al., vs. Ifran Khan et al., Defendants
Case No. BC615636
Rosenfeld Deposition 1-26-2019

In The Superior Court of the State of California In And For The County Of Los Angeles – Santa Monica
The San Gabriel Valley Council of Governments et al. vs El Adobe Apts. Inc. et al., Defendants
Case No. BC646857
Rosenfeld Deposition 10-6-2018; Trial 3-7-19

In United States District Court For The District of Colorado
Bells et al. Plaintiffs vs. The 3M Company et al., Defendants
Case No. 1:16-cv-02531-RBJ
Rosenfeld Deposition 3-15-2018 and 4-3-2018

In The District Court Of Regan County, Texas, 112th Judicial District
Phillip Bales et al., Plaintiff vs. Dow Agrosciences, LLC, et al., Defendants
Cause No. 1923
Rosenfeld Deposition 11-17-2017

In The Superior Court of the State of California In And For The County Of Contra Costa
Simons et al., Plaintifs vs. Chevron Corporation, et al., Defendants
Cause No. C12-01481
Rosenfeld Deposition 11-20-2017

In The Circuit Court Of The Twentieth Judicial Circuit, St Clair County, Illinois
Martha Custer et al., Plaintiff vs. Cerro Flow Products, Inc., Defendants
Case No.: No. 0i9-L-2295
Rosenfeld Deposition 8-23-2017

In United States District Court For The Southern District of Mississippi
Guy Manuel vs. The BP Exploration et al., Defendants
Case No. 1:19-cv-00315-RHW
Rosenfeld Deposition 4-22-2020

In The Superior Court of the State of California, For The County of Los Angeles
Warrn Gilbert and Penny Gilber, Plaintiff vs. BMW of North America LLC
Case No. LC102019 (c/w BC582154)
Rosenfeld Deposition 8-16-2017, Trail 8-28-2018

In the Northern District Court of Mississippi, Greenville Division
Brenda J. Cooper, et al., Plaintiffs, vs. Meritor Inc., et al., Defendants
Case No. 4:16-cv-52-DMB-JVM
Rosenfeld Deposition July 2017

In The Superior Court of the State of Washington, County of Snohomish
Michael Davis and Julie Davis et al., Plaintiff vs. Cedar Grove Composting Inc., Defendants
Case No. 13-2-03987-5
Rosenfeld Deposition, February 2017
Trial March 2017

In The Superior Court of the State of California, County of Alameda
Charles Spain., Plaintiff vs. Thermo Fisher Scientific, et al., Defendants
Case No. RG14711115
Rosenfeld Deposition September 2015

In The Iowa District Court In And For Poweshiek County
Russell D. Winburn, et al., Plaintiffs vs. Doug Hoksbergen, et al., Defendants
Case No. LALA002187
Rosenfeld Deposition August 2015

In The Circuit Court of Ohio County, West Virginia
Robert Andrews, et al. v. Antero, et al.
Civil Action No. 14-C-30000
Rosenfeld Deposition June 2015

In The Iowa District Court for Muscatine County
Laurie Freeman et. al. Plaintiffs vs. Grain Processing Corporation, Defendant
Case No. 4980
Rosenfeld Deposition May 2015

In the Circuit Court of the 17th Judicial Circuit, in and For Broward County, Florida
Walter Hinton, et. al. Plaintiff, vs. City of Fort Lauderdale, Florida, a Municipality, Defendant.
Case No. CACE07030358 (26)
Rosenfeld Deposition December 2014

In the County Court of Dallas County Texas
Lisa Parr et al, Plaintiff, vs. Aruba et al, Defendant.
Case No. cc-11-01650-E
Rosenfeld Deposition: March and September 2013
Rosenfeld Trial April 2014

In the Court of Common Pleas of Tuscarawas County Ohio
John Michael Abicht, et al., Plaintiffs, vs. Republic Services, Inc., et al., Defendants
Case No. 2008 CT 10 0741 (Cons. w/ 2009 CV 10 0987)
Rosenfeld Deposition October 2012

In the United States District Court for the Middle District of Alabama, Northern Division
James K. Benefield, et al., Plaintiffs, vs. International Paper Company, Defendant.
Civil Action No. 2:09-cv-232-WHA-TFM
Rosenfeld Deposition July 2010, June 2011

In the Circuit Court of Jefferson County Alabama
Jaeanette Moss Anthony, et al., Plaintiffs, vs. Drummond Company Inc., et al., Defendants
Civil Action No. CV 2008-2076
Rosenfeld Deposition September 2010

In the United States District Court, Western District Lafayette Division
Ackle et al., Plaintiffs, vs. Citgo Petroleum Corporation, et al., Defendants.
Case No. 2:07CV1052
Rosenfeld Deposition July 2009

August 29, 2025

Sent via email

Kern County Planning and Natural Resources Department
ATTN: Katrina Slayton, Division Chief
2700 "M" Street, Suite 100, Bakersfield, CA 93301
(661) 862-8957
Slaytonk@kerncounty.com

Re: Malibu Vineyards Industrial Parkway Project SCH# 2022080056

Dear Ms. Slayton:

These comments are submitted on behalf of the Center for Biological Diversity (the "Center") regarding the draft environmental impact report ("DEIR") for the Malibu Vineyards Industrial Parkway, State Clearinghouse Number 2022080056 (the "Project").

The Center is deeply concerned that an industrial development of this scale in unincorporated Kern County will cause unacceptable impacts to air quality and greenhouse gas emissions both within the County and along 580 and 1-5—not least from the 2,500 truck trips it will generate every day. (DEIR Appendix L at 13.) Further, the Project's other impacts—to biological resources, water supply, and traffic, among others—are also troubling.

The Center is a non-profit, public interest environmental organization dedicated to the protection of native species and their habitats through science, policy, and environmental law. The Center has over 68,000 thousand members and online activists throughout California and the United States. The Center has worked for many years to protect imperiled plants and wildlife, open space, air and water quality, and overall quality of life for people in Kern County.

I. THE EIR FAILED TO PROPERLY ANALYZE OR MITIGATE GREENHOUSE GAS IMPACTS.

The DEIR's analysis of the proposed Project's greenhouse gas ("GHG") emissions (DEIR Section 4.8) is deeply flawed. The Project would result in significant GHG emissions during construction and operation, yet the DIER does not properly analyze the significance of, or attempt to mitigate, the significant GHG impacts. (See CEQA Guidelines § 15126.2; Pub. Res. Code § 21002.)

A. Climate change is a catastrophic and pressing threat to California.

A strong, international scientific consensus has established that human-caused climate change is causing widespread harms to human society and natural systems, and that climate change threats are becoming increasingly dangerous. The Intergovernmental Panel on Climate Change (IPCC), the leading international scientific body for the assessment of climate change, concluded in its 2014 Fifth Assessment Report that: "[w]arming of the climate system is unequivocal, and since the 1950s, many of the observed changes are unprecedented over decades to millennia. The atmosphere and ocean have warmed, the amounts of snow and ice have diminished, and sea level has risen," and further that "[r]ecent climate changes have had widespread impacts on human and natural systems." (IPCC 2014.) These findings were echoed in the United States' own 2014 Third National Climate Assessment and 2017 Climate Science Special Report, prepared by scientific experts and reviewed by the National Academy of Sciences and multiple federal agencies. The Third National Climate Assessment concluded that "[m]ultiple lines of independent evidence confirm that human activities are the primary cause of the global warming of the past 50 years" and "[i]impacts related to climate change are already evident in many regions and are expected to become increasingly disruptive across the nation throughout this century and beyond." (Melillo 2014.)

Immediate and aggressive greenhouse gas emissions reductions are necessary to keep warming well below 2°C above pre-industrial levels. The IPCC Fifth Assessment Report and other expert assessments have established global carbon budgets, or the total amount of carbon that can be burned while maintaining some probability of staying below a given temperature target. According to the IPCC, total cumulative anthropogenic emissions of CO_2 must remain below about 1,000 $GtCO_2$ from 2011 onward for a 66 percent probability of limiting warming to 2°C above pre-industrial levels, and to 400 $GtCO_2$ from 2011 onward for a 66 percent probability of limiting warming to 1.5°C. (IPCC 2014 at 63-64 & Table 2.) These carbon budgets have been reduced to 850 $GtCO_2$ and 240 $GtCO_2$, respectively, from 2015 onward. (Rogelj 2016 at Table 2.) As of 2022, climate policies by the world's countries would lead to an estimated 2.7°C of warming, and possibly up to 3.6°C of warming, well above the level needed to avoid the worst dangers of climate change. (Climate Action Tracker 2022.)

The United States has contributed more to climate change than any other country. The U.S. is the world's biggest cumulative emitter of greenhouse gas pollution, responsible for 27 percent of cumulative global CO_2 emissions since 1850, and the U.S. is currently the world's second highest emitter on an annual and per capita basis. (World Resources Institute 2020.) Nonetheless, U.S. climate policy is wholly inadequate to meet the international climate target to hold global average temperature rise to well below 2°C above pre-industrial levels to avoid the worst dangers of climate change. Current U.S. climate policy has been ranked as "critically insufficient" by an international team of climate policy experts and climate scientists which concluded: "These steps represent a severe backwards move and an abrogation of the United States' responsibility as the world's second largest emitter at a time when more, not less, commitment is needed from all governments to avert the worst impacts of climate change." (Climate Action Tracker 2022.)

In its 2018 *Special Report on Global Warming of 1.5°C*, the IPCC—the leading international scientific body for the assessment of climate change—described the devastating harms that would occur at 2°C warming. The report highlights the necessity of limiting warming to 1.5°C to avoid catastrophic impacts to people and life on Earth. (IPCC 2018.) The report also provides overwhelming evidence that climate hazards are more urgent and more severe than previously thought, and that aggressive reductions in emissions within the next decade are essential to avoid the most devastating climate change harms.

In response to inadequate action on the national level, California has taken steps through legislation and regulation to fight climate change and reduce statewide GHG emissions. Enforcement and compliance with these steps are essential to help stabilize the climate and avoid catastrophic impacts to our environment. California has a mandate under AB 32 to reach 1990 levels of GHG emissions by the year 2020, equivalent to approximately a 15 percent reduction from a business-as-usual projection. (Health & Saf. Code, § 38550.) Based on the warning of the Intergovernmental panel on Climate Change and leading climate scientists, Governor Brown issued an executive order in April 2015 requiring GHG emission reduction 40 percent below 1990 levels by 2030. (Executive Order B-30-15 (2015).) The Executive Order is in line with a previous Executive Order mandating the state reduce emission levels to 80 percent below 1990 levels by 2050 in order to minimize significant climate change impacts. (Executive Order S-3-05 (2005).) In enacting SB 375, the state has also recognized the critical role that land use planning plays in achieving greenhouse gas emission reductions in California.

The state Legislature has found that failure to achieve greenhouse gas reduction would be "detrimental" to the state's economy. (Health & Saf. Code § 38501(b).) In his 2015 Inaugural Address, Governor Brown reiterated his commitment to reduce greenhouse gas emissions with three new goals for the next fifteen years:

- Increase electricity derived from renewable sources to 50 percent;
- Reduce today's petroleum use in cars and trucks by 50 percent;
- Double the efficiency of existing buildings and make heating fuels cleaner. (Brown 2015 Address.)

Although some sources of GHG emissions may seem insignificant, climate change is a problem with cumulative impacts and effects. (*Ctr. for Biological Diversity v. Nat'l Highway Traffic Safety Admin.*, (9th Cir. 2008) 538 F.3d 1172, 1217 ("the impact of greenhouse gas emissions on climate change is precisely the kind of cumulative impacts analysis" that agencies must conduct).) One source or one small project may not appear to have a significant effect on climate change, but the combined impacts of many sources can drastically damage California's climate as a whole. Therefore, project-specific GHG emission disclosure, analysis and mitigation is vital to California meeting its climate goals and maintaining our climate.

The impacts of climate change are already being felt by humans and wildlife. Human-induced climate change, including more frequent and intense extreme events, has caused widespread adverse impacts and related losses and damages to nature and people. (IPCC 2022.) This rise in weather and climate extremes has led to some irreversible impacts, as natural and human systems are pushed beyond their ability to adapt. (IPCC 2022.)

In the IPCC's most recent report, entitled *Climate Change 2022: Impacts, Adaptation and Vulnerability*, it found that warming is proceeding even faster than anticipated, and the best-case scenario for climate change is slipping out of reach. (IPCC 2022.) The report now estimates that, over the next 20 years, the world will cross the global warming threshold of 1.5°C. And unless there are immediate, rapid and large-scale reductions in greenhouse gas emissions, limiting warming to close to 1.5°C—or even 2°C—will be beyond reach. The United Nations Secretary General described the forecasts in this report as an "atlas of human suffering." (Borenstein 2022.)

Given the increasingly urgent need for drastic action to reduce GHG emissions, the DEIR's decision to give short shrift to the Project's significant climate change effects is all the more alarming.

B. The EIR's claim that the Project will emit significant GHGs is not supported by substantial evidence.

The EIR offers a muddled and inadequate GHG analysis that does not support the conclusion that the Project's 77,974 MTCO2e of annual emissions will not be significant. (DEIR at 4.8-19.) First, the EIR says that "for industrial projects, CARB proposed a quantitative threshold of 7,000 MTCO2e per year" and "emissions from the proposed project will be compared with the CARB thresholds, since they are more stringent" than the San Joaquin Valley Air Pollution Control District thresholds. (DEIR at 4.8-17.) However, the EIR never does apply the 7,000 threshold. Because the emissions are 11 times that threshold, GHG impacts are clearly significant under the CARB threshold. The EIR does not disclose this and instead concludes impacts are insignificant, after falsely claiming to use the CARB threshold.

The EIR next explains that the 2008 South Coast Air Quality Management District's ("SCAQMD") Interim GHG Significance Threshold is now outdated because of significant new GHG laws and executive orders adopted in 2016 and 2018. (DEIR at 4.8-17-18) For one, it is puzzling that the EIR bothers to explain why it does not use the South Coast's 2008 Guidance while ignoring the existence of the South Coast's recommended GHG threshold that was last revised in March 2023 and is certainly current. (SCQAMD 2023.) Furthermore, the EIR then goes on to use the imagined lack of guidance on GHG thresholds to justify using a threshold that relies entirely on compliance with cap-and-trade. (DEIR at 4.8-18.) The EIR claims that the SCAQMD certified that approach in 2014. (*Ibid*.) However, as the EIR itself points out, the State's GHG laws changed significantly in 2016 and 2018 and thresholds that do not conform to new GHG regulations are not appropriate. Instead of explaining how this Project's impacts are consistent with the State's current GHG policy, the EIR claims that any proposed project that complies with California's cap and trade program will not have significant impacts. This implausible claim is not supported by substantial evidence. It is contrary to the Attorney General's guidance on studying GHG impacts of warehouses under CEQA, which says that lead agencies must not discount GHG emissions based on participation in cap-and-trade and that compliance with existing regulations is a "baseline expectation" that does not discharge project-specific CEQA obligations. (AG 2023.)

C. The Project's GHG impacts are significant.

In striking contrast to the DEIR's attempted approach to downplay the significance of the Project's considerable GHG emissions, evidence from other expert agencies strongly indicates that the Project's 77,974 MTCO2e annual emissions are indeed significant. For example, the Bay Area Air Quality Management District's CEQA thresholds of significance for operational-related GHG emissions are:

- For land use development projects, the threshold is compliance with a qualified GHG Reduction Strategy; or annual emissions less than 1,100 metric tons per year (MT/yr) of CO2e; or 4.6 MTCO2e/SP/yr (residents + employees). Land use development projects include residential, commercial, industrial, and public land uses and facilities.
- For stationary-source projects, the threshold is 10,000 metric tons per year (MT/yr) of CO2e. Stationary-source projects include land uses that would accommodate processes and equipment that emit GHG emissions and would require an Air District permit to operate. If annual emissions of operational-related GHGs exceed these levels, the proposed project would result in a cumulatively considerable contribution of GHG emissions and a cumulatively significant impact to global climate change

(BAAQMD 2017 at p. 2-4.)

Similarly, the South Coast Air Quality Management District has established a 10,000 MTCO2e CEQA threshold of significance for industrial facilities. (SCQAMD 2023.) Both the BAAQMD's and the SCAQMD's CEQA thresholds of significance were formally adopted by those agencies after long consideration and a formal notice and comment rulemaking process, and are supported by substantial evidence. Under any of these thresholds—or any threshold supported by substantial evidence—the Project's anticipated annual GHG emissions of almost 70,000 MTCO2e annually is profoundly significant. The DEIR's attempt to claim otherwise through the use of a defective and misleading threshold of significance obscures the true extent of the Project's impacts and thwarts CEQA's purposes of informed decision-making and public transparency.

D. The EIR improperly failed to consider, much less adopt, feasible mitigation measures to reduce or avoid the Project's GHG impacts.

Because, as described above, the Project's GHG emissions impacts are significant, the DEIR's failure to consider and adopt all feasible mitigation to reduce or avoid the Project's significant impacts violates CEQA. (See Pub. Res. Code § 21002 [It is the "policy of the state that public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures which will avoid or substantially lessen the significant environmental effects of such projects."], CEQA Guidelines §§ 15092(b), 15043, 15126.4(a)(1).) The DEIR should be revised to adequately analyze the Project's GHG impacts, acknowledge their significance, and consider and adopt robust mitigation, including rooftop solar arrays sufficient to meet the energy needs of the project and infrastructure for electric trucks.

100% Rooftop Solar

The technology exists now to require all future building sites to install enough rooftop solar photovoltaic panels to meet 100% of projected energy needs or be built with the capacity

for these panels to be added later. In order to meet its decarbonization targets, California needs to double its clean energy generation in the next decade, which will require a "record-breaking" expansion of clean energy infrastructure. (Cart, California Energy Commission). The Joint Agency SB 100 Report calls for building 2.8 GW/year of solar every year for 25 years, which is higher than the previous maximum annual build. (California Energy Commission.) The biggest obstacle to increasing solar energy capacity as fast as it's needed is the large amount of flat, sunny land that solar farms require. (Groom) Building solar infrastructure across undeveloped land is an imperfect solution that hurts important ecosystems, eliminates opportunities for natural carbon sinks, and is often opposed by local residents. (Groom, Cart, Courage.)

Installing solar on the roofs of large warehouses in California is a crucial opportunity to use miles of flat, sunny space that would otherwise be wasted. The Inland Empire has an estimated 1 billion square feet of warehouse, or 37 square miles. (Calma.) A recent study found that California's 674 million square feet of big box stores could generate almost 10,000 gigawatt hours of energy from rooftop solar. (Huxley-Reicher et al.) Because warehouses in the Inland Empire cover much more square footage, their untapped potential is even greater than that.

Each warehouse built with the capacity to provide 100% of its own clean energy via rooftop solar brings California closer to the clean energy targets we must meet in order to avoid the most devastating effects of the climate crisis. The California Attorney General recommends that new warehouses are built with this capacity, and companies and municipalities are realizing it makes sense. (AGO 2021.) The City of Fontana already requires that every warehouse over 400,000 square feet get all its power from rooftop solar. (City of Fontana at 9-73.4) Because this is a feasible mitigation measure, the Project must require rooftop solar to meet 100 percent of the building's energy needs, instead of an unspecified "portion" of them. (DEIR at 1-69 [MM 4.6-1].)

Electric Truck Infrastructure

Emissions from heavy-duty diesel trucks are one of the most harmful effects of warehouse development. The only way to fully mitigate this harm is by transitioning to zero emissions heavy-duty trucks as quickly as possible. It's crucial that warehouse projects, as the sites of concentrated, severe diesel impacts, accommodate the transition to clean trucks.

The EIR must require concrete, enforceable measures that prepare the Project to operate with an all-electric fleet, as it will soon be required to do. CARB has developed strategies to achieve 100% zero-emissions from medium and heavy-duty on-road vehicles in the State by 2045 everywhere feasible, and specifically to achieve 100% zero-emissions drayage trucks by 2035. (CARB 2022.) The EIR must offer more electric truck charging infrastructure to meet the demands of the fleet mix of 2040. Otherwise, the Project will lag sorely behind the much-needed transition and will cement diesel emissions for decades. First, the Project must have an electric truck charging stations sufficient to allow every truck that serves the Project to be charged. Second, the Project must have electric plugs for electric transport refrigeration units at every dock door, if the warehouse use could include refrigeration. Third, the projected energy use of an all-electric fleet must be added to the Project's projected electricity use and met with on-site solar panels.

II. THE EIR FAILED TO ADEQUATELY MITIGATE THE PROJECT'S SIGNIFICANT ADVERSE AIR QUALITY IMPACTS.

Warehouse projects are well-documented sources of air quality degradation that can create serious, negative health outcomes for communities (Betancourt, 2012 at 4-5). Particulate emissions from diesel vehicles that carry freight to and from warehouses contribute to "cardiovascular problems, cancer, asthma, decreased lung function and capacity, reproductive health problems, and premature death." (*Id.* at 5).

The EIR relies on an inadequate mitigation measure to conclude that the Project will not significantly impact air quality. The EIR implausibly claims that after implementation of the "Voluntary Emission Reduction Agreement," ("VERA") emissions of ROG, NOx, PM10 and PM2.5 will all be reduced to zero, through the funding of unspecified "emissions reductions projects." (DEIR at 4.3-37.) This improperly deferred and overly vague mitigation violates CEQA. (see *San Joaquin Raptor Rescue Center v. County of Merced* (2007) 149 Cal.App.4th 645, 670 [EIR inadequate where the success or failure of mitigation efforts "may largely depend upon management plans that have not yet been formulated and have not been subject to analysis and review within the EIR"]). In the limited circumstances in which deferred mitigation is appropriate, the agency must meet all of the following elements: (1) practical considerations prevented the formulation of mitigation measures during the planning process; (2) the agency committed itself to developing mitigation measures in the future; (3) the agency adopted specific performance criteria prior to project approval; and (4) the EIR lists the mitigation measures to be considered, analyzed, and possibly incorporated into the mitigation plan. (See *POET, LLC v. State Air Resources Bd.* (2013) 218 Cal.App.4th 681, 736-37 [review denied].) Here, the DEIR fails to meet these criteria. It does not attempt to explain why it is not possible to formulate and disclose a mitigation plan now, and it does not list the mitigation measures to be considered.

Even more concerning is that the emissions reduction projects funded through VERA might be off-site projects anywhere in the County with no connection to the Project. Offset schemes must be carefully tailored to comply with CEQA's requirements (see generally *Golden Door Properties, LLC v. County of San Diego* (2020) 50 Cal.App.5th 467) and must be evaluated as a last option for mitigation where no other options are available or feasible. In this case, the County has not considered all other feasible options. Allowing a Project to emit without limit as long as the developer pays for some environmental project somewhere else raises serious environmental justice concerns. The EIR has not established that this vague, undefined plan will effectively reduce the impact of this Project to less than significant. (*Banning Ranch Conservancy v. City of Newport (2012) 211 Cal.App.4th 1209, 1232-34*.)

The County must require an EIR to adequately analyze the Project's air quality impacts, acknowledge their significance, and consider and adopt feasible mitigation to reduce those impacts.

Electrical Equipment on Site

Warehouses require cargo handling equipment, like forklifts and pallet jacks, that produce considerable air pollution if they run on diesel. (CARB 2020.) Those emissions contribute to the Project's emissions from mobile sources, which are by far the largest source of air pollutants. (DEIR at 4.3-36.) Therefore, the California Attorney General recommends that all electrical equipment that warehouses use on-site should be zero-emission. (AGO 2021.) However, this EIR only requires the use of electric construction equipment "whenever possible" and does not include any requirement to electrify operational equipment. (DEIR at 4.3-39 [MM 4.3-3].)

However, zero emissions equipment requirements are feasible and becoming more and more common. The City of Fontana Warehouse Ordinance requires that all on-site motorized equipment be zero emission. (City of Fontana at 9-73.1). The Speedway Commerce Center II Project in San Bernadino County and the Beaumont Summit Station Project in Riverside County both require that all outdoor cargo handling equipment is zero-emission and powered by electricity (Speedway Commerce Center DEIR at 1-16; Beaumont Summit Station DEIR at 4.2-22). Additionally, the California Air Resources Board ("CARB") recommended that warehouses require that all service equipment (like yard hostlers, yard equipment, forklifts, and pallet jacks) that tenants use on-site to be zero emission in 2019. CARB said that the equipment was "widely available" in 2020. (CARB 2020). Further, CARB provides incentive funding to purchase zero emissions equipment through the Clean Off-Road Equipment Voucher Incentive. EIR did not provide substantial evidence that this measure is infeasible. In fact, the evidence shows that it is feasible and common.

Idling times

The DEIR does not adopt any mitigation measures to limit the amount of time that trucks are allowed to idle, despite both the Attorney General and the SJVAPCD's recommendation that it do so. (DEIR at 2-9, AGO 2021.) This is a feasible measure that must be included.

VOC Emissions

The DEIR does not adopt any mitigation measure to limit the VOC level in architectural paints and coatings, although the California Attorney General recommends a 10 g/L limit. (AGO 2021.) By falling so far short of the Attorney General's best practices, the EIR fails to properly mitigate a significant impact.

III. CONCLUSION

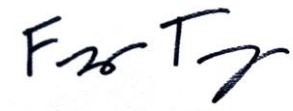
Thank you for the opportunity to submit comments on the Draft Environmental Impact Report for the Malibu Vineyards Industrial Parkway Project. We urge the County to revise the DEIR and recirculate a legally adequate EIR before considering approval of the Project.

Given the possibility that the Center will be required to pursue legal remedies in order to ensure that the County complies with its legal obligations including those arising under CEQA, we would like to remind the County of its statutory duty to maintain and preserve all documents and communications that may constitute part of the "administrative record" of this proceeding.

(§ 21167.6(e); *Golden Door Properties, LLC v. Superior Court* (July 30, 2020, Nos. D076605, D076924, D076993) ___Cal.App.5th___ [2020 Cal. App. LEXIS 710.) The administrative record encompasses any and all documents and communications that relate to any and all actions taken by the County with respect to the Project, and includes "pretty much everything that ever came near a proposed [project] or [] the agency's compliance with CEQA . . . ." (*County of Orange v. Superior Court* (2003) 113 Cal.App.4th 1, 8.) The administrative record further includes all correspondence, emails, and text messages sent to or received by the County's representatives or employees, that relate to the Project, including any correspondence, emails, and text messages sent between the County's representatives or employees and the Applicant's representatives or employees. Maintenance and preservation of the administrative record requires that, *inter alia*, the County (1) suspend all data destruction policies; and (2) preserve all relevant hardware unless an exact replica of each file is made.

Please add the Center to your notice list for all future updates to the Project and do not hesitate to contact the Center with any questions at the number or email listed below.

Sincerely,



Frances Tinney
Attorney
1212 Broadway, Suite #800
Oakland, CA 94612
Tel: (509) 432-9256
ftinney@biologicaldiversity.org

References

Beaumont Summit Station Specific Plan DEIR- 4.7 Greenhouse Gas Emissions. (2022). City of Beaumont. Available at: https://www.beaumontca.gov/DocumentCenter/View/37636/47-Greenhouse-Gas

Betancourt, S. & Vallianatos, M. (2012). Storing Harm: The Health and Community Impacts of Goods Movement Warehousing and Logistics. The Impact Project Policy Brief Series. Available at: https://envhealthcenters.usc.edu/wpcontent/uploads/2016/11/Storing-Harm.pdf.

Borenstein, S. (2022, February 28). UN climate report: 'Atlas of human suffering' worse, bigger. AP News. Available at: https://apnews.com/article/climate-science-europe-united-nations-weather 8d5e277660f7125ffdab7a833d9856a

California Office of the Attorney General (AGO) (2021, March). Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act. Available at: https://oag.ca.gov/sites/all/files/agweb/pdfs/environment/warehouse-best-practices.pdf

California Office of the Attorney General (AGO) (2022, September). Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act. Available at: https://oag.ca.gov/system/files/media/warehouse-best-practices.pdf

CARB. (2020.) Recommended Air Pollution Emission Reduction Measures for Warehouses and Distribution Centers.

Climate Action Tracker, Public data – emissions pathways (November 2021). Available at: https://climateactiontracker.org/global/temperatures/.

Climate Action Tracker, USA (last updated 16 August 2022), http://climateactiontracker.org/countries/usa.

IPCC, 2013: Summary for Policymakers. In: Climate Change 2013: The Physical Science Basis, Contribution of Working Group I to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change [Stocker, T.F. et al. (eds.)], Cambridge University Press (2013).

IPCC, Climate Change 2014: Synthesis Report. Contribution of Working Groups I, II and III to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change, [Core Writing Team, R.K. Pachauri & L.A. Meyer (eds.)], IPCC, Geneva, Switzerland (2014), http://www.ipcc.ch/pdf/assessment-report/ar5/syr/SYR_AR5_FINAL_full_wcover.pdf

IPCC, Hicke, J.A., S. Lucatello, L.D., Mortsch, J. Dawson, M. Domínguez Aguilar, C.A.F. Enquist, E.A. Gilmore, D.S. Gutzler, S. Harper, K. Holsman, E.B. Jewett, T.A. Kohler, and KA. Miller. (2022). North America. In: Climate Change 2022: Impacts, Adaptation

and Vulnerability. Contribution of Working Group II to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change [H.-O. Pörtner, D.C. Roberts, M. Tignor, E.S. Poloczanska, K. Mintenbeck, A. Alegría, M. Craig, S. Langsdorf, S. Löschke, V. Möller, A. Okem, B. Rama (eds.)]. Cambridge University Press, Cambridge, UK and New York, NY, USA, pp. 1929–2042, doi:10.1017/9781009325844.016.

IPCC, Special Report on Global Warming of 1.5°C, IPCC, Geneva, Switzerland (2018), https://www.ipcc.ch/site/assets/uploads/sites/2/2019/06/SR15_Full_Report_High_Res.pdf.

Maclean, Ilya M. D. & Robert J. Wilson, Recent ecological responses to climate change support predictions of high extinction risk, 108 PNAS 12337 (2011).

Melillo, Jerry M, Terese (T.C.) Richmond & Gary W. Yohe (eds.), Climate Change Impacts in the United States: The Third National Climate Assessment, U.S. Global Change Research Program (2014), http://nca2014.globalchange.gov/downloads at 7.

NRC [National Research Council], Advancing the Science of Climate Change, National Research Council (2010), www.nap.edu at 2.

South Coast Air Quality Management District (SCAQMD). (2023). South Coast AQMD Air Quality Significance Thresholds.

Speedway Commerce Center II Specific Plan Project DEIR. (2022). Land Use Services Department, San Bernadino County. Available at: https://www.sbcounty.gov/uploads/LUS/Environmental/SPEEDWAY_EIR/Speedway%20Commerce%20Center%20II%20Specific%20Plan%20DEIR%20(1).pdf

Thomas, Chris. D. et al., Extinction risk from climate change, 427 Nature 145 (2004).

Urban, Mark C., Accelerating extinction risk from climate change, 348 Science 571 (2015).

USGCRP [U.S. Global Change Research Program], Climate Science Special Report: Fourth National Climate Assessment, Volume I [Wuebbles, D.J. et al. (eds.)], U.S. Global Change Research Program, Washington, DC (2017), https://science2017.globalchange.gov/ at 10.

Warren, Rachel et al. (2008). Increasing impacts of climate change upon ecosystems with increasing global mean temperature rise, 106 Climatic Change 141.

Wiens, J. J. (2016). Climate-related local extinctions are already widespread among plant and animal species. PLoS Biology, 14(12), 1–18.

World Resources Institute, This Interactive Chart Shows Changes in the World's Top 10 Emitters (December 10, 2020). Available at: https://www.wri.org/insights/interactive-chart-shows-changes-worlds-top-10-emitters/

P: (626) 314-3821
F: (626) 389-5414
E: info@mitchtsailaw.com

Mitchell M. Tsai
Law Firm

139 South Hudson Avenue
Suite 200
Pasadena, California 91101

VIA E-MAIL

August 29, 2024

Kern County Planning and Natural Resources Department
ATTN: Katrina Slayton, Division Chief
2700 "M" Street, Suite 100
Bakersfield, CA 93301
Ph: (661) 862-8957
Em: slaytonk@kerncounty.com

RE: Kern County's Malibu Vineyards Industrial Parkway Project – Draft Environmental Impact Report (SCH# 2022080056)

Dear Katrina Slayton,

On behalf of the Western States Regional Council of Carpenters ("**Western States Carpenters**" or "**WSRCC**"), our firm is submitting these comments in connection with the County of Kern's ("**County**") Draft Environmental Impact Report ("**DEIR**") for the Malibu Vineyards Parkway Industrial Project ("**Project**").

The DEIR contains the following general description of the Project:

> [T]he proposed project … consists of approximately 8,907,446 square-feet of industrial use space, comprised of 24 buildings on 739 acres of existing vineyard. The project is proposed by Malibu Vineyards, LP (project proponent), and would be developed over two phases.
>
> Implementation of the project as proposed would require adoption of the Malibu Vineyards Industrial Parkway Specific Plan (included as Appendix B). Additionally, the project requires an amendment to the Kern County General Plan (KCGP) Land Use, Open Space and Conservation Element designation from Intensive Agriculture (8.1) to Service Industrial (7.2), an amendment to the Metropolitan Bakersfield General Plan Land Use Element designation from Intensive Agriculture (R-IA) to Service Industrial (SI), and a Zone Change from Exclusive Agriculture (A) to Medium Industrial, Precise Development (M-2 PD).

> …
>
> The proposed project site encompasses approximately 739-acres composed of 21 parcels within unincorporated Kern County, north of Imperial Avenue and generally east of State Route 99 (SR 99), with site access from Saco Road and Imperial Avenue. The project site is east of the City of Shafter, which is on the west side of SR 99, and approximately one mile north of the City of Bakersfield … The Lerdo Canal trends northwest to southeast through Phase 2 of the project site.
>
> …
>
> The proposed project would be developed in two Phases; Phase 1 includes seven existing parcels on approximately 534 acres, and is located between Burbank Street to the north, and Imperial Avenue to the south, with the western boundary being the Ledo Canal and frontage road.
>
> …
>
> Phase 2 includes 14 existing parcels on approximately 205 acres, east of SR 99 and west of the Lerdo Canal. The site is located generally south of Ledo Highway, and north of Imperial Avenue.

DEIR, p. 1-1.

WSRCC represents thousands of union carpenters in Kern County and has a strong interest in well-ordered land use planning and in addressing the environmental impacts of development projects.

Individual members of WSRCC live, work, and recreate in the County and surrounding communities and would be directly affected by the Project's environmental impacts.

WSRCC expressly reserves the right to supplement these comments at or prior to hearings on the Project, and at any later hearing and proceeding related to this Project. Gov. Code, § 65009, subd. (b); Pub. Res. Code, § 21177, subd. (a); see *Bakersfield Citizens for Local Control v. Bakersfield* (2004) 124 Cal.App.4th 1184, 1199-1203; see also *Galante Vineyards v. Monterey Water Dist.* (1997) 60 Cal.App.4th 1109, 1121.

WSRCC incorporates by reference all comments related to the Project or its CEQA review, including the Environmental Impact Report. See *Citizens for Clean Energy v City of Woodland* (2014) 225 Cal.App.4th 173, 191 (finding that any party who has objected

to the project's environmental documentation may assert any issue timely raised by other parties).

Moreover, WSRCC requests that the County provide notice for any and all notices referring or related to the Project issued under the California Environmental Quality Act (**CEQA**) (Pub. Res. Code, § 21000 *et seq.*), and the California Planning and Zoning Law ("**Planning and Zoning Law**") (Gov. Code, §§ 65000–65010). California Public Resources Code Sections 21092.2, and 21167(f) and California Government Code Section 65092 require agencies to mail such notices to any person who has filed a written request for them with the clerk of the agency's governing body.

I. THE COUNTY SHOULD REQUIRE THE USE OF A LOCAL WORKFORCE TO BENEFIT THE COMMUNITY'S ECONOMIC DEVELOPMENT AND ENVIRONMENT

The County should require the Project to be built by contractors who participate in a Joint Labor-Management Apprenticeship Program approved by the State of California and make a commitment to hiring a local workforce.

Community benefits such as local hire can also be helpful to reduce environmental impacts and improve the positive economic impact of the Project. Local hire provisions requiring that a certain percentage of workers reside within 10 miles or less of the Project site can reduce the length of vendor trips, reduce greenhouse gas emissions, and provide localized economic benefits. As environmental consultants Matt Hagemann and Paul E. Rosenfeld note:

> [A]ny local hire requirement that results in a decreased worker trip length from the default value has the potential to result in a reduction of construction-related GHG emissions, though the significance of the reduction would vary based on the location and urbanization level of the project site.

March 8, 2021 SWAPE Letter to Mitchell M. Tsai re Local Hire Requirements and Considerations for Greenhouse Gas Modeling.

Workforce requirements promote the development of skilled trades that yield sustainable economic development. As the California Workforce Development Board and the University of California, Berkeley Center for Labor Research and Education concluded:

> [L]abor should be considered an investment rather than a cost—and investments in growing, diversifying, and upskilling California's workforce can positively affect returns on climate mitigation efforts. In other words, well-trained workers are key to delivering emissions reductions and moving California closer to its climate targets.[1]

Furthermore, workforce policies have significant environmental benefits given that they improve an area's jobs-housing balance, decreasing the amount and length of job commutes and the associated greenhouse gas (GHG) emissions. In fact, on May 7, 2021, the South Coast Air Quality Management District found that that the "[u]se of a local state-certified apprenticeship program" can result in air pollutant reductions.[2]

Locating jobs closer to residential areas can have significant environmental benefits. As the California Planning Roundtable noted in 2008:

> People who live and work in the same jurisdiction would be more likely to take transit, walk, or bicycle to work than residents of less balanced communities and their vehicle trips would be shorter. Benefits would include potential reductions in both vehicle miles traveled and vehicle hours traveled.[3]

Moreover, local hire mandates and skill-training are critical facets of a strategy to reduce vehicle miles traveled (VMT). As planning experts Robert Cervero and Michael Duncan have noted, simply placing jobs near housing stock is insufficient to achieve VMT reductions given that the skill requirements of available local jobs must

---

[1] California Workforce Development Board (2020) Putting California on the High Road: A Jobs and Climate Action Plan for 2030 at p. ii, *available at* https://laborcenter.berkeley.edu/wp-content/uploads/2020/09/Putting-California-on-the-High-Road.pdf.

[2] South Coast Air Quality Management District (May 7, 2021) Certify Final Environmental Assessment and Adopt Proposed Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions Program, and Proposed Rule 316 – Fees for Rule 2305, Submit Rule 2305 for Inclusion Into the SIP, and Approve Supporting Budget Actions, *available at* http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2021/2021-May7-027.pdf?sfvrsn=10.

[3] California Planning Roundtable (2008) Deconstructing Jobs-Housing Balance at p. 6, *available at* https://cproundtable.org/static/media/uploads/publications/cpr-jobs-housing.pdf

match those held by local residents.[4] Some municipalities have even tied local hire and other workforce policies to local development permits to address transportation issues. Cervero and Duncan note that:

> In nearly built-out Berkeley, CA, the approach to balancing jobs and housing is to create local jobs rather than to develop new housing. The city's First Source program encourages businesses to hire local residents, especially for entry- and intermediate-level jobs, and sponsors vocational training to ensure residents are employment-ready. While the program is voluntary, some 300 businesses have used it to date, placing more than 3,000 city residents in local jobs since it was launched in 1986. When needed, these carrots are matched by sticks, since the city is not shy about negotiating corporate participation in First Source as a condition of approval for development permits.

Recently, the State of California verified its commitment towards workforce development through the Affordable Housing and High Road Jobs Act of 2022, otherwise known as Assembly Bill No. 2011 ("**AB2011**"). AB2011 amended the Planning and Zoning Law to allow ministerial, by-right approval for projects being built alongside commercial corridors that meet affordability and labor requirements.

The County should consider utilizing local workforce policies and requirements to benefit the local area economically and to mitigate greenhouse gas, improve air quality, and reduce transportation impacts.

II. THE CITY SHOULD IMPOSE TRAINING REQUIREMENTS FOR THE PROJECT'S CONSTRUCTION ACTIVITIES TO PREVENT COMMUNITY SPREAD OF COVID-19 AND OTHER INFECTIOUS DISEASES

Construction work has been defined as a Lower to High-risk activity for COVID-19 spread by the Occupations Safety and Health Administration. Recently, several

[4] Cervero, Robert and Duncan, Michael (2006) Which Reduces Vehicle Travel More: Jobs-Housing Balance or Retail-Housing Mixing? Journal of the American Planning Association 72 (4), 475-490, 482, *available at* http://reconnectingamerica.org/assets/Uploads/UTCT-825.pdf.

construction sites have been identified as sources of community spread of COVID-19.[5]

The Western States Carpenters recommend that the County adopt additional requirements to mitigate public health risks from the Project's construction activities. The Western States Carpenters requests that the County require safe on-site construction work practices as well as training and certification for any construction workers on the Project Site.

In particular, based upon the Western States Carpenters' experience with safe construction site work practices, the Western States Carpenters recommends that the County require that while construction activities are being conducted at the Project Site:

Construction Site Design:

- The Project Site will be limited to two controlled entry points.
- Entry points will have temperature screening technicians taking temperature readings when the entry point is open.
- The Temperature Screening Site Plan shows details regarding access to the Project Site and Project Site logistics for conducting temperature screening.
- A 48-hour advance notice will be provided to all trades prior to the first day of temperature screening.
- The perimeter fence directly adjacent to the entry points will be clearly marked indicating the appropriate 6-foot social distancing position for when you approach the screening area. Please reference the Apex temperature screening site map for additional details.
- There will be clear signage posted at the project site directing you through temperature screening.

[5] Santa Clara County Public Health (June 12, 2020) COVID-19 CASES AT CONSTRUCTION SITES HIGHLIGHT NEED FOR CONTINUED VIGILANCE IN SECTORS THAT HAVE REOPENED, *available at* https://www.sccgov.org/sites/covid19/Pages/press-release-06-12-2020-cases-at-construction-sites.aspx.

- Provide hand washing stations throughout the construction site.

Testing Procedures:

- The temperature screening being used are non-contact devices.
- Temperature readings will not be recorded.
- Personnel will be screened upon entering the testing center and should only take 1-2 seconds per individual.
- Hard hats, head coverings, sweat, dirt, sunscreen or any other cosmetics must be removed on the forehead before temperature screening.
- Anyone who refuses to submit to a temperature screening or does not answer the health screening questions will be refused access to the Project Site.
- Screening will be performed at both entrances from 5:30 am to 7:30 am.; main gate [ZONE 1] and personnel gate [ZONE 2]
- After 7:30 am only the main gate entrance [ZONE 1] will continue to be used for temperature testing for anybody gaining entry to the project site such as returning personnel, deliveries, and visitors.
- If the digital thermometer displays a temperature reading above 100.0 degrees Fahrenheit, a second reading will be taken to verify an accurate reading.
- If the second reading confirms an elevated temperature, DHS will instruct the individual that he/she will not be allowed to enter the Project Site. DHS will also instruct the individual to promptly notify his/her supervisor and his/her human resources (HR) representative and provide them with a copy of Annex A.

Planning

- Require the development of an Infectious Disease Preparedness and Response Plan that will include basic infection prevention measures (requiring the use of personal protection equipment), policies and procedures for prompt identification and isolation of sick individuals, social distancing (prohibiting gatherings of no more than 10 people including all-hands meetings and all-hands lunches) communication and training and workplace controls that meet standards that may be promulgated by the Center for Disease Control, Occupational Safety and Health Administration, Cal/OSHA, California Department of Public Health or applicable local public health agencies.[6]

The United Brotherhood of Carpenters and Carpenters International Training Fund has developed COVID-19 Training and Certification to ensure that Carpenter union members and apprentices conduct safe work practices. The County should require that all construction workers undergo COVID-19 Training and Certification before being allowed to conduct construction activities at the Project Site.

The Western States Carpenters has also developed a rigorous Infection Control Risk Assessment ("**ICRA**") training program to ensure it delivers a workforce that understands how to identify and control infection risks by implementing protocols to protect themselves and all others during renovation and construction projects in healthcare environments.[7]

ICRA protocols are intended to contain pathogens, control airflow, and protect patients during the construction, maintenance and renovation of healthcare facilities.

---

[6] *See also* The Center for Construction Research and Training, North America's Building Trades Unions (April 27 2020) NABTU and CPWR COVIC-19 Standards for U.S Constructions Sites, *available at* https://www.cpwr.com/sites/default/files/NABTU_CPWR_Standards_COVID-19.pdf; Los Angeles County Department of Public Works (2020) Guidelines for Construction Sites During COVID-19 Pandemic, *available at* https://dpw.lacounty.gov/building-and-safety/docs/pw_guidelines-construction-sites.pdf.

[7] For details concerning the Western States Carpenters' ICRA training program, *see* https://icrahealthcare.com/.

ICRA protocols prevent cross contamination, minimizing the risk of secondary infections in patients at hospital facilities.

The County should require the Project to be built using a workforce trained in ICRA protocols.

III. THE CALIFORNIA ENVIRONMENTAL QUALITY ACT

CEQA is a California statute designed to inform decision-makers and the public about the potential significant environmental effects of a project. 14 California Code of Regulations ("**CEQA Guidelines**"), § 15002, subd. (a)(1).[8] At its core, its purpose is to "inform the public and its responsible officials of the environmental consequences of their decisions *before* they are made. Thus, the EIR 'protects not only the environment but also informed self-government[.]'" *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 564 (internal citation omitted).

To achieve this purpose, CEQA mandates preparation of an Environmental Impact Report ("**EIR**") for projects so that the foreseeable impacts of pursuing the project can be understood and weighed. *Communities for a Better Environment v. Richmond* (2010) 184 Cal. App. 4th 70, 80. The EIR requirement "is the heart of CEQA." CEQA Guidelines, § 15003(a).

CEQA directs public agencies to avoid or reduce environmental damage, when possible, by requiring alternatives or mitigation measures. CEQA Guidelines, § 15002, subds. (a)(2)-(3); see also *Berkeley Keep Jets Over the Bay Committee v. Board of Port Commissioners of the City of Oakland* (2001) 91 Cal.App.4th 1344, 1354; *Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376, 400. The Environmental Impact Report (EIR) serves to provide public agencies and the public in general with information about the effect that a proposed project is likely to have on the environment and to "identify ways that environmental damage can be avoided or significantly reduced." CEQA Guidelines, § 15002, subd. (a)(2).

A public agency must prepare an EIR whenever substantial evidence supports a "fair argument" that a proposed project "may have a significant effect on the

[8] The CEQA Guidelines, codified in Title 14 of the California Code of Regulations, section 15000 et seq., are regulatory guidelines promulgated by the state Natural Resources Agency for the implementation of CEQA. Pub. Res. Code, § 21083. The CEQA Guidelines are given "great weight in interpreting CEQA except when . . . clearly unauthorized or erroneous." *Center for Biological Diversity v. Dept. of Fish & Wildlife* (2015) 62 Cal.4th 204, 217.

environment." Pub. Res. Code, §§ 21100, 21151; CEQA Guidelines, §§ 15002, subds. (f)(1)-(2), 15063; *No Oil, supra,* 13 Cal.App.3d at p. 75; *Communities for a Better Environment v. California Resources Agency* (2002) 103 Cal.App.4th 98, 111-112. If the project has a significant effect on the environment, the agency may approve the project only upon finding that it has "eliminated or substantially lessened all significant effects on the environment where feasible" and that any unavoidable significant effects on the environment are "acceptable due to overriding concerns" specified in Public Resources Code section 21081. See CEQA Guidelines, §§ 15092, subds. (b)(2)(A)-(B).

Essentially, should a lead agency be presented with a fair argument that a project may have a significant effect on the environment, the lead agency shall prepare an EIR even though it may also be presented with other substantial evidence that the project will not have a significant effect. CEQA Guidelines, §§ 15064(f)(1)-(2); see *No Oil, supra,* 13 Cal.App.3d at p. 75 (internal citations and quotations omitted). Substantial evidence includes "enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion, even though other conclusions might also be reached." CEQA Guidelines, § 15384, subd. (a).

The EIR has been described as "an environmental 'alarm bell' whose purpose it is to alert the public and its responsible officials to environmental changes before they have reached ecological points of no return." *Berkeley Keep Jets Over the Bay v. Bd. of Port Comm'rs.* (2001) 91 Cal. App. 4th 1344, 1354 ("*Berkeley Jets")*; *County of Inyo v. Yorty* (1973) 32 Cal. App. 3d 795, 810.

The preparation and circulation of an EIR is more than a set of technical hurdles for agencies and developers to overcome. *Communities for a Better Environment v. Richmond* (2010) 184 Cal.App.4th 70, 80 (quoting *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 449-450). The EIR's function is to ensure that government officials who decide to build or approve a project do so with a full understanding of the environmental consequences and, equally important, that the public is assured those consequences have been considered. *Id.* For the EIR to serve these goals it must present information so that the foreseeable impacts of pursuing the project can be understood and weighed, and the public must be given an adequate opportunity to comment on that presentation before the decision to go forward is made. *Id.*

A strong presumption in favor of requiring preparation of an EIR is built into CEQA. This presumption is reflected in what is known as the "fair argument" standard under which an EIR must be prepared whenever substantial evidence in the record supports a fair argument that a project may have a significant effect on the environment. *Quail Botanical Gardens Found., Inc. v. City of Encinitas* (1994) 29 Cal.App.4th 1597, 1602; *Friends of "B" St. v. City of Hayward* (1980) 106 Cal.3d 988, 1002.

Further, it is the duty of the lead agency, not the public, to conduct the proper environmental studies. "The agency should not be allowed to hide behind its own failure to gather relevant data." *Sundstrom, supra,* 202 Cal.App.3d at p. 311. "Deficiencies in the record may actually enlarge the scope of fair argument by lending a logical plausibility to a wider range of inferences." *Ibid*; see also *Gentry v. City of Murrieta* (1995) 36 Cal.App.4th 1359, 1382 (lack of study enlarges the scope of the fair argument which may be made based on the limited facts in the record).

Thus, refusal to complete recommended studies lowers the already low threshold to establish a fair argument. The court may not exercise its independent judgment on the omitted material by determining whether the ultimate decision of the lead agency would have been affected had the law been followed. *Environmental Protection Information Center v. Cal. Dept. of Forestry* (2008) 44 Cal.4th 459, 486 (internal citations and quotations omitted). The remedy for this deficiency would be for the trial court to issue a writ of mandate. *Ibid.*

While the courts review an EIR using an 'abuse of discretion' standard, the reviewing court is not to *uncritically* rely on every study or analysis presented by a project proponent in support of its position. *Berkeley Keep Jets*, *supra*, 91 Cal.App.4th at p. 1355 (quoting *Laurel Heights, supra,* 47 Cal.3d at pp. 391, 409 fn. 12) (internal quotations omitted). A clearly inadequate or unsupported study is entitled to no judicial deference. *Ibid.* Drawing this line and determining whether the EIR complies with CEQA's information disclosure requirements presents a question of law subject to independent review by the courts. *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 515; *Madera Oversight Coalition, Inc. v. County of Madera* (2011) 199 Cal.App.4th 48, 102, 131. As the First District Court of Appeal has previously stated, prejudicial abuse of discretion occurs if the failure to include relevant information precludes informed decision-making and informed public participation, thereby thwarting the statutory goals of the EIR process. *Berkeley Keep Jets, supra*, 91 Cal.App.4th at p. 1355 (internal quotations omitted).

Both the review for failure to follow CEQA's procedures and the fair argument test are questions of law, thus, the de novo standard of review applies. *Vineyard Area Citizens for Responsible Growth v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 435. Whether the agency's record contains substantial evidence that would support a fair argument that the project may have a significant effect on the environment is treated as a question of law. *Consolidated Irrigation Dist.*, *supra*, 204 Cal.App.4th at p. 207; Kostka and Zischke, Practice Under the Environmental Quality Act (2017, 2d ed.) at § 6.76.

Section 15088.5(a) of the CEQA Guidelines provides that an EIR must be recirculated whenever there is disclosure of significant new information. Significant new information includes: (1) disclosure of a new significant environmental impact resulting from the project or from a new proposed mitigation measure; (2) disclosure of a substantial increase in the severity of an environmental impact unless mitigation measures are adopted that reduce the impact to a level of insignificance; and (3) disclosure of a feasible project alternative or mitigation measure considerably different from others previously analyzed which would clearly lessen the significant environmental impacts of the project which the project proponents decline to adopt. *Id.*

Additionally, an EIR must be recirculated when it is so fundamentally inadequate and conclusory in nature that meaningful public review and comment is precluded. *Id.* [citing *Mountain Lion Coalition v. Fish & Game Com.* (1989) 214 Cal.App.3d 1043].

Here, as discussed below, the DEIR fails to substantiate all of its conclusions to allow meaningful public review and comment, provide adequate mitigation measures, and fully assess all pertinent environmental factors. Accordingly, this comment letter discloses significant new information, necessitating revision and recirculation of the DEIR.

IV. THE DEIR IS INADEQUATE UNDER CEQA AND SHOULD BE REVISED AND RECIRCULATED

A. The DEIR Fails to Support Its Findings with Substantial Evidence

CEQA requires that an EIR identify and discuss the significant effects of a Project, how those significant effects can be mitigated or avoided. CEQA Guidelines § 15126.2; PRC §§ 21100(b)(1), 21002.1(a). If a project has a significant effect on the environment, an agency may approve the project only upon finding that it has "eliminated or substantially lessened all significant effects on the environment where

feasible" and that any unavoidable significant effects on the environment are "acceptable due to overriding concerns." CEQA Guidelines § 15092(b)(2)(A–B). Such findings must be supported by substantial evidence. CEQA Guidelines § 15091(b).

When new information is brought to light showing that an impact previously discussed in the DEIR but found to be insignificant with or without mitigation in the DEIR's analysis has the potential for a significant environmental impact supported by substantial evidence, the DEIR must consider and resolve the conflict in the evidence. See *Visalia Retail, L.P. v. City of Visalia* (2018) 20 Cal. App. 5th 1, 13, 17; see also *Protect the Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal. App. 4th 1099, 1109. While a lead agency has discretion to formulate standards for determining significance and the need for mitigation measures—the choice of any standards or thresholds of significance must be "based to the extent possible on scientific and factual data and an exercise of reasoned judgment based on substantial evidence. CEQA Guidelines § 15064(b); *Cleveland Nat'l Forest Found. v. San Diego Ass'n of Gov'ts* (2017) 3 Cal. App. 5th 497, 515; *Mission Bay Alliance v. Office of Community Inv. & Infrastructure* (2016) 6 Cal. App. 5th 160, 206. And when there is evidence that an impact could be significant, an EIR cannot adopt a contrary finding without providing an adequate explanation along with supporting evidence. *East Sacramento Partnership for a Livable City v. City of Sacramento* (2016) 5 Cal. App. 5th 281, 302.

In addition, a determination that regulatory compliance will be sufficient to prevent significant adverse impacts must be based on a project-specific analysis of potential impacts and the effect of regulatory compliance. In *Californians for Alternatives to Toxics v. Department of Food & Agric.* (2005) 136 Cal. App. 4th 1, the court set aside an EIR for a statewide crop disease control plan because it did not include an evaluation of the risks to the environment and human health from the proposed program but simply presumed that no adverse impacts would occur from use of pesticides in accordance with the registration and labeling program of the California Department of Pesticide Regulation. *See also Ebbetts Pass Forest Watch v Department of Forestry & Fire Protection* (2008) 43 Cal. App. 4th 936, 956 (fact that Department of Pesticide Regulation had assessed environmental effects of certain herbicides in general did not excuse failure to assess effects of their use for specific timber harvesting project).

Here, for the reasons discussed in detail below, the DEIR fails to comply with the foregoing requirements.

1. The DEIR Omits Critical Information in Its Analysis of the Project's Cumulative Impacts

An EIR must discuss a cumulative impact if the project's incremental effect combined with the effects of other projects is "cumulatively considerable." 14 C.C.R. §15130(a). This determination is based on an assessment of the project's incremental effects "viewed in connection with the effects of ***past projects***, the effects of other current projects, and the effects of probable future projects." 14 C.C.R. §15065(a)(3)(emphasis added); *Banning Ranch Conservancy v City of Newport Beach* (2012) 211 CA4th 1209, 1228. See also 14 C.C.R. §15355(b).

The CEQA Guidelines require that an EIR implement the provisions of Pub. Res. Code §21083(b)(2), which specifies that the Guidelines must include criteria requiring public agencies to find that a project may have a significant effect on the environment if its possible effects "are individually limited but cumulatively considerable."

The purpose of the cumulative impacts analysis is to avoid considering projects in a vacuum, because failure to consider cumulative harm may risk environmental disaster. *Whitman v Board of Supervisors* (1979) 88 Cal.App.3d 397, 408 (*citing Natural Resources Defense Council v Callaway* (2d Cir 1975) 524 F2d 79). Without this analysis, piecemeal approval of several projects with related impacts could lead to severe environmental harm. *Golden Door Props., LLC v County of San Diego* (2020) 50 Cal.App.5th 467, 527; *San Joaquin Raptor/Wildlife Rescue Ctr. v County of Stanislaus* (1994) 27 Cal.App.4th 713, 720; *Las Virgenes Homeowners Fed'n v County of Los Angeles* (1986) 177 Cal.App.3d 300, 306. An adequate analysis of cumulative impacts is particularly important when another related project might significantly worsen the project's adverse environmental impacts. *Friends of the Eel River v Sonoma County Water Agency* (2003) 108 CA4th 859.

An EIR must discuss cumulative impacts when they are significant, and the project's incremental contribution is "cumulatively considerable." 14 C.C.R. §15130(a). A project's incremental contribution is cumulatively considerable if the incremental effects of the project are significant "when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects." 14 C.C.R. §15065(a)(3).

Here, the DEIR for the Project already notes that the Project is anticipated to have significant and unavoidable impacts singularly in the areas of Aesthetics, Agriculture and Forestry Resources, Air Quality, Population and Housing, and Transportation and

Traffic, and cumulatively in the impact areas of Aesthetics, Agriculture and Forestry Resources, Air Quality, GHG Emissions, Hydrology and Water Quality, Noise, Population and Housing, Transportation and Traffic, and Utilities and Service Systems. Despite the wide scope of significant impacts presented by the Project both individually and cumulatively, the DEIR contains no reference to or consideration whatsoever of several nearby ***past*** development projects (as required by 14 C.C.R. §15065(a)(3)) that have already been completed. Indeed, Table 3-5 of the DEIR lists the projects that the DEIR considered, in conjunction with the proposed Project, as part of its cumulative impacts analysis. See DEIR at pp. 3-60 – 3-63. However, the DEIR's Cumulative Projects list omits a number of previously-completed large-scale projects within the 6-mile radius of the Project, and their associated environmental impacts, including Bakersfield's Meadows Field Airport and the Halliburton headquarters (located at the northwest corner of 7th Standard Road and Coffee Road).

These significant omissions taint and effectively undermine the validity of much of the cumulative impacts analysis set forth in the DEIR. Indeed, the failure to consider these previously-completed, significant, large-scale, industrial development projects in the immediate vicinity of the proposed Project calls into question the DEIR's cumulative impacts analysis in impact categories such as agricultural resources, air quality, energy use, greenhouse gases, transportation, noise, hydrology and water quality, public services, utilities and service systems, and aesthetics. The DEIR must now be revised with respect to each of the foregoing impact categories (and potentially others) to incorporate any significant past projects within the 6-mile cumulative projects radius, including the Meadows Field Airport and the Halliburton headquarters, in its cumulative impacts analysis. Absent such revision, the DEIR in its current form violates CEQA and cannot permissibly be certified by the County.

B. The DEIR's Mitigation Measures Are Insufficient

A fundamental purpose of an EIR is to identify ways in which a proposed project's significant environmental impacts can be mitigated or avoided. Pub. Res. Code §§ 21002.1(a), 21061. To implement this statutory purpose, an EIR must describe any feasible mitigation measures that can minimize the project's significant environmental effects. PRC §§ 21002.1(a), 21100(b)(3); CEQA Guidelines §§ 15121(a), 15126.4(a).

If the project has a significant effect on the environment, the agency may approve the project only upon finding that it has "eliminated or substantially lessened all significant effects on the environment where feasible" PRC §§ 21002; 21002.1, 21081;

CEQA Guidelines §§ 15091, 15092(b)(2)(A); and find that 'specific overriding economic, legal, social, technology or other benefits of the project outweigh the significant effects on the environment." PRC §§ 21002; 21002.1, 21081; CEQA Guidelines §§ 15091, 15092(b)(2)(B). "A gloomy forecast of environmental degradation is of little or no value without pragmatic, concrete means to minimize the impacts and restore ecological equilibrium." *Environmental Council of Sacramento v. City of Sacramento* (2006) 142 Cal.App.4th 1018, 1039.

CEQA mitigation measures proposed and adopted are required to describe what actions will be taken to reduce or avoid an environmental impact. (CEQA Guidelines § 15126.4(a)(1)(B) [providing "[f]ormulation of mitigation measures should not be deferred until some future time."].) While the same Guidelines section 15126.5(a)(1)(B) acknowledges an exception to the rule against deferrals, such exception is narrowly proscribed to situations where it is impractical or infeasible to include those details during the project's environmental review.

According to CEQA Guidelines, "[w]hen an EIR has been prepared for a project, the Responsible Agency shall not approve the project as proposed if the agency finds any feasible alternative or feasible mitigation measures within its powers that would substantially lessen or avoid any significant effect the project would have on the environment." CEQA Guidelines Section 15096(g)(2).

Here, the EIR's mitigation measures for the Project are in adequate as follows:

1. The DEIR's Air Quality Mitigation Fails to Consider and Deploy All Feasible Mitigation Measures

The DEIR concludes that the Project will have significant Air Quality impacts, since the proposed Project "would result in a cumulatively considerable net increase of [one or more] criteria pollutant[s] for which the Project region is in nonattainment under an applicable Federal or State Ambient Air Quality Standard." DEIR, p. 1-60. The Project proposes to follow certain regulatory requirements and proposes various mitigation measures to further reduce these air quality impacts. DEIR at pp. 1-57-60. Notwithstanding, the DEIR concludes the Project's air quality impacts on this impact area are "significant and unavoidable" DEIR at p. 1-60.

However, an impact can only be labeled as significant-and-unavoidable after all available, feasible mitigation is considered and the EIR lacks substantial evidence to support a finding that no other feasible mitigation existed to mitigate Project's

significant impacts. Here, the Project's Air Quality Mitigation Measures do not consider or incorporate certain project design features and emission reduction strategies recommended by CAPCOA, as discussed in greater detail in the discussion below concerning the Project's Greenhouse Gas Emissions impacts and mitigation measures.

Given the current anticipated air quality impacts of the Project are considered substantial and unavoidable, all such air quality-preserving mitigation measures should considered in analyzed in the Project's EIR prior to arriving at the conclusion that such Air Quality impacts will indeed be significant and unavoidable. Thus, at a minimum, the DEIR should be revised and recirculated to incorporate those mitigation measures discussed below that co-benefit the Project's air quality impacts and GHG emissions impacts.

2. The DEIR's Mitigation Measures Are Improperly Deferred for Various Impact Categories

CEQA forbids deferred mitigation. Guidelines § 15126.4(a)(1)(B). CEQA allows deferral of details of a mitigation measure only "when it is impractical or infeasible to include those details during the project's environmental review." (*Id.*) CEQA further requires: "that the agency (1) commits itself to the mitigation, (2) adopts specific performance standards the mitigation will achieve, and (3) identifies the type(s) of potential action(s) that can feasibly achieve that performance standard…" Guidelines § 15126.4(a)(1)(B). Deferring formulation of a Project's actual mitigation measures to some undefined time after the Project's approval is improper and cannot be used as a substitute for proper mitigation under CEQA. Impermissible deferral can occur when an EIR calls for mitigation measures to be created based on future studies or describes mitigation measures in general terms but the agency fails to commit itself to specific performance standards. (*Preserve Wild Santee v. City of Santee* (2012) 210 Cal.App.4th 260, 281 [city improperly deferred mitigation to butterfly habitat by failing to provide standards or guidelines for its management].)

Here, the EIR improperly defers details of the Project's mitigation measures as discussed in detail below.

i. Biological Resources Mitigation Measures

The Project's Biological Resources Mitigation Measure 4.4-2 (MM 4.4-2) provides as follows, in relevant part:

> Prior to the issuance of grading or building permits, the Lead Biologist shall develop a Worker Environmental Awareness Training Program containing life history and identification information of special-status wildlife and plant species with potential to occur on site.

DEIR at p. 1-63.

The above mitigation measures, on its face, defers the preparation of the Project's Worker Environmental Awareness Training Program (WEATP) until after the CEQA environmental review process for the Project is completed, thereby denying the public and the County's decisionmakers of the opportunity to assess the adequacy and comment upon said program/plan. Additionally, the MM 4.4-2 improperly shifts the burden of preparation of the mitigation plan to the applicant (and its designated biological consultant), when it is in fact the County's responsibility, as lead agency, to ensure that the preparation and implementation of the WEATP.

Thus, in the context of MM 4.4-2, the County has failed to meet CEQA's preconditions and requirements concerning mitigation, as the EIR has failed to show why the Project's WEATP cannot be completed or achieved at this time prior to adoption of the EIR, what impacts the measures will have individually or cumulatively, if those would indeed be feasible, and the specific performance criteria the Applicant will have to meet with regard to the measures. Accordingly, the proposed mitigation measure is improperly deferred as it defers the formulation of components of the mitigation to a later time, shifts the burden to the Applicant, and further does not explain how the measures will clearly reduce the Project's biological resources impacts to a level of insignificance.

ii. Energy Use Mitigation Measures

The Project's Energy Use Mitigation Measure 4.6-1 (MM 4.6-1) provides as follows, in relevant part:

> Prior to the issuance of grading or building permits, the project proponent shall provide a report and summary of all energy efficient building design standards incorporated into the project design and operations to reduce the level of energy consumption of the project

DEIR at p. 1-69.

The above mitigation measures, on its face, defers the preparation of the Project's report/summary of the energy efficiency building design standards until after the CEQA environmental review process for the Project is completed, thereby denying the public and the County's decisionmakers of the opportunity to assess the adequacy and comment upon said report. Additionally, the MM 4.6-1 improperly shifts the burden of preparation of the mitigation plan to the applicant, when it is again the County's responsibility, as lead agency, to ensure that the energy efficiency measures for the Project are adequate to achieve the desired level of impact mitigation and will in fact be implemented into the Project.

Thus, in the context of MM 4.6-1, the County has again failed to meet CEQA's preconditions and requirements concerning mitigation, as the EIR has failed to show why the Project's report/summary of the energy efficiency building design standards cannot be completed or achieved at this time prior to adoption of the EIR, what impacts the measures will have individually or cumulatively, if those would indeed be feasible, and the specific performance criteria the Applicant will have to meet with regard to the measures. Accordingly, the proposed mitigation measure is improperly deferred as it defers the formulation of components of the mitigation to a later time, shifts the burden to the Applicant, and further does not explain how the measures will clearly reduce the Project's energy use impacts to a level of insignificance.

iii. *Greenhouse Gas Emissions Mitigation Measures*

The Project's Greenhouse Gas Emissions Mitigation Measure 4.8-1 (MM 4.8-1) provides as follows, in relevant part:

> Prior to the issuance of grading or building permits, the project proponent shall submit a focused Greenhouse Gas report that identifies the measures (regulatory or applicant implemented) for a target reduction of 29 percent of operational emissions of the project's mobile CO2e emissions as quantified in this EIR. The focused air analysis shall be submitted to the San Joaquin Valley Air Pollution Control District for review and comment regarding the methodology used to quantify the reductions.

DEIR at p. 1-74.

The above mitigation measure, on its face, defers the preparation of the Project's Greenhouse Gas report until after the CEQA environmental review process for the

Project is completed, thereby denying the public and the County's decisionmakers of the opportunity to assess the adequacy and comment upon said report. Additionally, the MM 4.8-1 improperly shifts the burden of preparation of the mitigation plan to the applicant, when it is in fact the County's responsibility, as lead agency, to ensure that the GHG emission reduction measures for the Project will achieve the 29% reduction of operational emissions for the Project's mobile sources.

Thus, in the context of MM 4.8-1, the County has failed to meet CEQA's preconditions and requirements concerning mitigation, as the EIR has failed to show why the Project's GHG report cannot be completed or achieved at this time prior to adoption of the EIR, what impacts the measures will have individually or cumulatively, if those would indeed be feasible, and the specific performance criteria the Applicant will have to meet with regard to the measures. Accordingly, the proposed mitigation measure is improperly deferred as it defers the formulation of components of the mitigation to a later time, shifts the burden to the Applicant, and further does not explain how the measures will clearly reduce the Project's GHG impacts to a level of insignificance.

Additionally, the DEIR finds that the Project's cumulative GHG impacts will be significant and unavoidable. DEIR at 1-75.

As stated in the Office of Planning Research's ("**OPR**") technical advisory in 2018:

> VMT and Greenhouse Gas Emissions Reduction. Senate Bill 32 (Pavley, 2016) requires California to reduce greenhouse gas (GHG) emissions 40 percent below 1990 levels by 2030, and Executive Order B-16-12 provides a target of 80 percent below 1990 emissions levels for the transportation sector by 2050.

Despite the Project's clear GHG cumulative emissions impact in direct contravention of SB 32's GHG reduction goals, the EIR does not make an adequate effort to otherwise reduce the Project's GHG impacts through other specific project design features aimed at reducing GHG emissions.

Moreover, the Project is not consistent with the CARB 2022 Scoping Plan. Indeed, the first action item in the Scoping Plan is reduce GHG emissions "40% below 1990 levels by 2030."[9] The CARB Scoping Plan also sets forth the action item that new

[9] California Air Resources Board 2022 Scoping Plan at p. 72; https://ww2.arb.ca.gov/sites/default/files/2023-04/2022-sp.pdf

residential and commercial buildings will have "[a]ll electric appliances beginning 2026 (residential) and 2029 (commercial), contributing to 6 million heat pumps installed statewide by 2030."[10]

Despite the clear path presented by the CARB Scoping Plan for reducing GHG emissions, the DEIR declines to hold the Project to that standard, and instead deflects its responsibility to mitigate significant GHG emissions impacts to the greatest degree possible, pursuant to CEQA's mandate.

Indeed, it is the County's obligation, as lead agency, to ensure that the Project's environmental impacts have first been properly analyzed and then mitigated to a less than significant level wherever possible. WSRCC submits that the Project's implementation of the additional potential mitigation measures set forth below (where applicable), as delineated by the California Air Pollution Control Officers Association's *Quantifying Greenhouse Gas Mitigation Measures*, would contribute toward the goal of reducing the Project's GHG emission impacts to the maximum extent possible:

Energy						
Category	Measure Number	Strategy	BMP	Grouped With #	Range of Effectiveness	
					Percent Reduction in GHG Emissions	Basis
Building Energy Use	BE-1	Buildings exceed Title 24 Building Envelope Energy Efficiency Standards by X% (X is equal to the percentage improvement selected for the project			For a 10% improvement over 2008 Title 24: Non-Residential electricity use: 0.2-5.5%; natural gas use: 0.7-10% Residential electricity use: 0.3-2.6%; natural gas use: 7.5-9.1%	
	BE-2	Install Programmable Thermostat Timers	x		BMP	
	BE-3	Obtain Third-party HVAC Commissioning and Verification of Energy Savings	x	BE-1	BMP	
	BE-4	Install Energy Efficient Appliances			Residential building: 2-4% Grocery Stores: 17-22%	Appliance Electricity Use
	BE-5	Install Energy Efficient Boilers			1.2-18.4%	Fuel Use

[10] *Id.* at p. 75

Alternative Energy Generation	AE-1	Establish Onsite Renewable Energy Systems-Generic			0-100%	
	AE-2	Establish Onsite Renewable Energy Systems-Solar Power			0-100%	
	AE-3	Establish Onsite Renewable Energy Systems-Wind Power			0-100%	
	AE-4	Utilize a Combined Heat and Power System			0-46%	
	AE-5	Establish Methane Recovery in Landfills			73-77%	
	AE-6	Establish Methane Recovery in Wastewater Treatment Plants			95-97%	
Lighting	LE-1	Install Higher Efficacy Public Street and Area Lighting			16-40%	Outdoor Lighting Electricity Use
	LE-2	Limit Outdoor Lighting Requirements	x		BMP	
	LE-3	Replace Traffic Lights with LED Traffic Lights			90%	Traffic Light Electricity Use

Transportation						
Category	Measure Number	Strategy	BMP	Grouped With #	Range of Effectiveness	
					Percent Reduction in GHG Emissions	Basis
Land Use / Location	LUT-1	Increase Density			1.5-30.0%	VMT
	LUT-2	Increase Location Efficiency			10-65%	VMT
	LUT-3	Increase Diversity of Urban and Suburban Developments (Mixed Use)			9-30%	VMT
	LUT-4	Incr. Destination Accessibility			6.7-20%	VMT
	LUT-5	Increase Transit Accessibility			0.5-24.6%	VMT
	LUT-6	Integrate Affordable and Below Market Rate Housing			0.04-1.20%	VMT
	LUT-7	Orient Project Toward Non-Auto Corridor			NA	
	LUT-8	Locate Project near Bike Path/Bike Lane			NA	
	LUT-9	Improve Design of Development			3.0-21.3%	VMT

Neighborhood / Site Design	SDT-1	Provide Pedestrian Network Improvements			0-2%	VMT
	SDT-2	Traffic Calming Measures			0.25-1.00%	VMT
	SDT-3	Implement a Neighborhood Electric Vehicle (NEV) Network			0.5-12.7%	VMT
	SDT-4	Urban Non-Motorized Zones		SDT-1	NA	
	SDT-5	Incorporate Bike Lane Street Design (on-site)		LUT-9	NA	
	SDT-6	Provide Bike Parking in Non-Residential Projects		LUT-9	NA	
	SDT-7	Provide Bike Parking in Multi-Unit Residential Projects		LUT-9	NA	
	SDT-8	Provide EV Parking		SDT-3	NA	
	SDT-9	Dedicate Land for Bike Trails		LUT-9	NA	
Parking Policy / Pricing	PDT-1	Limit Parking Supply			5-12.5%	
	PDT-2	Unbundle Parking Costs from Property Cost			2.6-13%	
	PDT-3	Implement Market Price Public Parking (On-Street)			2.8-5.5%	
	PDT-4	Require Residential Area Parking Permits		PDT-1, 2 & 3	NA	
Trip Reduction Programs	TRT-1	Implement Voluntary CTR Programs			1.0-6.2%	Commute VMT
	TRT-2	Implement Mandatory CTR Programs – Required Implementation/Monitoring			4.2-21.0%	Commute VMT
	TRT-3	Provide Ride-Sharing Programs			1-15%	Commute VMT
	TRT-4	Implement Subsidized or Discounted Transit Prog.			0.3-20.0%	Commute VMT
	TRT-5	Provide End of Trip Facilities		TRT-1, 2 & 3	NA	
	TRT-6	Telecommuting and Alternative Work Schedules			0.07-5.50%	Commute VMT
	TRT-7	Implement Commute Trip Reduction Marketing			0.8-4.0%	Commute VMT
	TRT-8	Implement Preferential Parking Permit Program		TRT-1, 2 & 3	NA	
	TRT-9	Implement Car-Sharing Program			0.4-0.7%	VMT
	TRT-10	Implement School Pool Program			7.2-15.8%	School VMT

	TRT-11	Provide Employer-Sponsored Vanpool/Shuttle			0.3-13.4%	Commute VMT
	TRT-12	Implement Bike-Sharing Program		SDT-5, LUT-9	NA	
	TRT-13	Implement School Bus Program			38-63%	School VMT
	TRT-14	Price Workplace Parking			0.1-19.7%	Commute VMT
	TRT-15	Implement Employee Parking "Cash-Out"			0.6-7.7%	Commute VMT
Transit System Improvements	TST-1	Provide a Bus Rapid Transit System			0.02-3.2%	VMT
	TST-2	Implement Transit Access Improvements		TST-3, TST-4	NA	
	TST-3	Expand Transit Network			0.1-8.2%	VMT
	TST-4	Increase Transit Service Frequency/Speed			0.02-2.5%	VMT
	TST-5	Provide Bike Parking Near Transit		TST-3, TST-4	NA	
	TST-6	Provide Local Shuttles		TST-3, TST-4	NA	
Road Pricing / Management	RPT-1	Implement Area or Cordon Pricing			7.9-22.0%	VMT
	RPT-2	Improve Traffic Flow			0-45%	VMT
	RPT-3	Require Project Contributions to Transportation Infrastructure Improvement Projects		RPT-2, TST-1 to 6	NA	
	RPT-4	Install Park-and-Ride Lots		RPT-1, TRT-11, TRT-3, TST-1 to 6	NA	
Vehicles	VT-1	Electrify Loading Docks and/or Require Idling-Reduction Systems			26-71%	Truck Idling Time
	VT-2	Utilize Alternative Fueled Vehicles			Varies	
	VT-3	Utilize Electric or Hybrid Vehicles			0.4-20.3%	Fuel Use

Water						
Category	Measure Number	Strategy	BMP	Grouped With #	Range of Effectiveness	
					Percent Reduction in GHG Emissions	Basis
Water Supply	WSW-1	Use Reclaimed Water			up to 40% for Northern Californiaup to 81% for Southern California	Outdoor Water Use
	WSW-2	Use Gray Water			0-100%	Outdoor Water Use
	WSW-3	Use Locally-Sourced Water Supply			0-60% for Northern and Central California; 11-75% for Southern California	Indoor and Outdoor Water Use
Water Use	WUW-1	Install Low-Flow Water Fixtures.			Residential: 20% Non-Residential: 17-31%	Indoor Water Use
	WUW-2	Adopt a Water Conservation Strategy.			varies	
	WUW-3	Design Water-Efficient Landscapes			0-70%	Outdoor Water Use
	WUW-4	Use Water-Efficient Landscape Irrigation Systems			6.1%	Outdoor Water Use
	WUW-5	Reduce Turf in Landscapes and Lawns			varies	
	WUW-6	Plant Native or Drought-Resistant Trees and Vegetation			BMP	

Area Landscaping						
Category	Measure Number	Strategy	BMP	Grouped With #	Range of Effectiveness	
					Percent Reduction in GHG Emissions	Basis
Area Landscaping	A-1	Prohibit Gas Powered Landscape Equipment.			LADWP: 2.5-46.5% PG&E: 64.1-80.3% SCE: 49.5-72.0% SDGE: 38.5-66.3% SMUD: 56.3-76.0%	Fuel Use
	A-2	Implement Lawnmower Exchange Program			BMP	
	A-3	Electric Yard Equipment Compatibility		A-1 or A-2	BMP	

Solid Waste						
Category	Measure Number	Strategy	BMP	Grouped With #	Range of Effectiveness	
					Percent Reduction in GHG Emissions	Basis
Solid Waste	SW-1	Institute or Extend Recycling and Composting Services			BMP	
	SW-2	Recycle Demolished Construction Material			BMP	

Vegetation						
Category	Measure Number	Strategy	BMP	Grouped With #	Range of Effectiveness	
					Percent Reduction in GHG Emissions	Basis
Vegetation	V-1	Urban Tree Planting		GP-4	varies	
	V-2	Create new vegetated open space.			varies	

Construction						
Category	Measure Number	Strategy	BMP	Grouped With #	Range of Effectiveness	
					Percent Reduction in GHG Emissions	Basis
Construction	C-1	Use Alternative Fuels for Construction Equipment			0-22%	Fuel Use
	C-2	Use Electric and Hybrid Construction Equipment			2.5-80%	Fuel Use
	C-3	Limit Construction Equipment Idling beyond Regulation Requirements			varies	
	C-4	Institute a Heavy-Duty Off-Road Vehicle Plan		Any C	BMP	
	C-5	Implement a Vehicle Inventory Tracking System		Any C	BMP	

Miscellaneous						
Category	Measure Number	Strategy	BMP	Grouped With #	Range of Effectiveness	
					Percent Reduction in GHG Emissions	Basis
Miscellaneous	Misc-1	Establish a Carbon Sequestration Project			varies	
	Misc-2	Establish Off-Site Mitigation			varies	
	Misc-3	Use Local and Sustainable Building Materials	x		BMP	
	Misc-4	Require Best Management Practices in Agriculture and Animal Operations	x		BMP	
	Misc-5	Require Environmentally Responsible Purchasing	x		BMP	
	Misc-6	Implement an Innovative Strategy for GHG Mitigation	x		BMP	

General Plan Strategies						
Category	Measure Number	Strategy	BMP	Grouped With #	Range of Effectiveness	
					Percent Reduction in GHG Emissions	Basis
General Plans	GP-1	Fund Incentives for Energy Efficiency	x		BMP	
	GP-2	Establish a Local Farmer's Market	x		BMP	
	GP-3	Establish Community Gardens	x		BMP	
	GP-4	Plant Urban Shade Trees	x	V-1	BMP	
	GP-5	Implement Strategies to Reduce Urban Heat-Island Effect	x		BMP	

(See *Quantifying Greenhouse Gas Mitigation Measures*, Tables 6-1 to 6-9, California Air Pollution Control Officers Association (CAPCOA), August 2010.[11])

It is entirely feasible for the DEIR to incorporate a substantial proportion of the foregoing measures for the Project as mandatory forms of mitigation against the

[11] Available at: http://www.aqmd.gov/docs/default-source/ceqa/handbook/capcoa-quantifying-greenhouse-gas-mitigation-measures.pdf

Project's significant and unavoidable cumulative greenhouse gas impacts. More is required, and as currently constituted, the DEIR's improper analysis and lack of appropriate mitigation on GHG impacts violates CEQA.

iv. *Hazards and Hazardous Materials Mitigation Measures*

The Project's Hazards and Hazardous Materials Mitigation Measure 4.9-1 (MM 4.9-1) provides as follows, in relevant part:

> Prior to the issuance of grading or building permits related to facilities requiring a Spill Prevention Control and Countermeasures Response Plan, the project proponent shall prepare and submit a Spill Prevention Control and Countermeasures Response Plan to the Kern County Public Health Services Department, Environmental Health Division, and the California Department of Water Resources, for review and approval by those agencies. The project proponent shall ensure the project is implemented in compliance with the approved Spill Prevention Control and Countermeasures Response Plan.

See DEIR at p. 1-75.

Additionally, Hazards and Hazardous Materials Mitigation Measure 4.9-3 (MM 4.9-3) provides as follows, in relevant part:

> Prior to the issuance of grading or building permits, and during the life of the project, the project operator shall prepare and maintain a Hazardous Materials Business Plan (HMBP), as applicable, pursuant to Article 1 and Article 2 of California Health and Safety Code 6.95 and in accordance with Kern County Ordinance Code 8.04.030, by submitting all the required information to the California Environmental Reporting System (CERS) at http://cers.calepa.ca.gov/ for review and approval.

DEIR at p. 1-75.

Thus, the above mitigation measures, on their face, defer the preparation of the Project's Spill Prevention Control and Countermeasures Response Plan (SPCCRP) and Hazardous Materials Business Plan (HMBP) until after the CEQA environmental review process for the Project is completed, thereby denying the public and the County's decisionmakers of the opportunity to assess the adequacy and comment upon such plans.

In the context of MM 4.9-1 and 4.9-3, the County has failed to meet CEQA's preconditions and requirements concerning mitigation, as the EIR has failed to show why a SWPPP and/or a final hydrologic study and drainage plan cannot be completed or achieved at this time prior to adoption of the EIR, what impacts the measures will have individually or cumulatively, if those would indeed be feasible, and the specific performance criteria the Applicant will have to meet with regard to the measures. Accordingly, the proposed mitigation measures are improperly deferred as it defers the formulation of components of the mitigation to a later time, shifts the burden to the Applicant, and further does not explain how the measures will clearly reduce the hazards impacts to a level of insignificance.

v. *Hydrology and Water Quality Mitigation Measures*

The Project's Hydrology and Water Quality Mitigation Measure 4.10-1 (MM 4.10-1) provides as follows, in relevant part:

> Prior to issuance of a grading permit, and prior to engagement of decommissioning activities, the project proponent/operator shall submit a Stormwater Pollution Prevention Plan (SWPPP) for review and approval by the Regional Water Quality Control Board. The SWPPP shall be designed to minimize runoff and shall specify best management practices to prevent all construction pollutants from contacting stormwater, with the intent of keeping sediment or any other pollutants from moving off-site and into receiving waters.

See DEIR at p. 1-79.

Additionally, Hydrology and Water Quality Mitigation Measure 4.10-2 (MM 4.10-1) provides as follows, in relevant part:

> Prior to the issuance of a grading permit, the project proponent/operator shall submit a final hydrologic study and drainage plan for review and approval by the Kern County Public Works Department. The final hydrologic study and drainage plan shall be designed to evaluate and minimize potential increases in runoff from the project site.

Once again, the above mitigation measures, on their face, defer the preparation of the Project's Stormwater Pollution Prevention Plan (SWPPP) and final hydrologic study and drainage plan until after the CEQA environmental review process for the Project

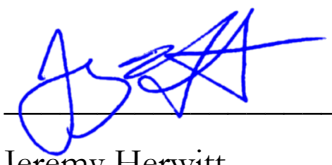
is completed, thereby denying the public and the County's decisionmakers of the opportunity to assess the adequacy and comment upon such plans.

In the context of MM 4.10-1 and 4.10-2, the County has failed to meet CEQA's preconditions and requirements concerning mitigation, as the EIR has failed to show why a SWPPP and/or a final hydrologic study and drainage plan cannot be completed or achieved at this time prior to adoption of the EIR, what impacts the measures will have individually or cumulatively, if those would indeed be feasible, and the specific performance criteria the Applicant will have to meet with regard to the measures. Accordingly, the proposed mitigation measures are improperly deferred as it defers the formulation of components of the mitigation to a later time, shifts the burden to the Applicant, and further does not explain how the measures will clearly reduce the hydrology and water quality impacts to a level of insignificance.

V. CONCLUSION

Based on the foregoing concerns, the County should require revision and recirculation of the DEIR for the Project pursuant to CEQA. Absent doing so, the DEIR in its current form directly violates CEQA in multiple respects. If the County should have any questions or concerns, please do not hesitate to contact this office.

Sincerely,



Jeremy Herwitt
Attorneys for Western States Regional
Council of Carpenters

Attached:

March 8, 2021 SWAPE Letter to Mitchell M. Tsai re Local Hire Requirements and Considerations for Greenhouse Gas Modeling (**Exhibit A**);

Air Quality and GHG Expert Paul Rosenfeld CV (**Exhibit B**);

Air Quality and GHG Expert Matt Hagemann CV (**Exhibit C**)

EXHIBIT A

SWAPE Technical Consultation, Data Analysis and Litigation Support for the Environment

2656 29th Street, Suite 201
Santa Monica, CA 90405

Matt Hagemann, P.G, C.Hg.
(949) 887-9013
mhagemann@swape.com

Paul E. Rosenfeld, PhD
(310) 795-2335
prosenfeld@swape.com

March 8, 2021

Mitchell M. Tsai
155 South El Molino, Suite 104
Pasadena, CA 91101

Subject: Local Hire Requirements and Considerations for Greenhouse Gas Modeling

Dear Mr. Tsai,

Soil Water Air Protection Enterprise ("SWAPE") is pleased to provide the following draft technical report explaining the significance of worker trips required for construction of land use development projects with respect to the estimation of greenhouse gas ("GHG") emissions. The report will also discuss the potential for local hire requirements to reduce the length of worker trips, and consequently, reduced or mitigate the potential GHG impacts.

Worker Trips and Greenhouse Gas Calculations

The California Emissions Estimator Model ("CalEEMod") is a "statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and greenhouse gas (GHG) emissions associated with both construction and operations from a variety of land use projects."[1] CalEEMod quantifies construction-related emissions associated with land use projects resulting from off-road construction equipment; on-road mobile equipment associated with workers, vendors, and hauling; fugitive dust associated with grading, demolition, truck loading, and on-road vehicles traveling along paved and unpaved roads; and architectural coating activities; and paving.[2]

The number, length, and vehicle class of worker trips are utilized by CalEEMod to calculate emissions associated with the on-road vehicle trips required to transport workers to and from the Project site during construction.[3]

[1] "California Emissions Estimator Model." CAPCOA, 2017, *available at:* http://www.aqmd.gov/caleemod/home.
[2] "California Emissions Estimator Model." CAPCOA, 2017, *available at:* http://www.aqmd.gov/caleemod/home.
[3] "CalEEMod User's Guide." CAPCOA, November 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/01_user-39-s-guide2016-3-2_15november2017.pdf?sfvrsn=4, p. 34.

Specifically, the number and length of vehicle trips is utilized to estimate the vehicle miles travelled ("VMT") associated with construction. Then, utilizing vehicle-class specific EMFAC 2014 emission factors, CalEEMod calculates the vehicle exhaust, evaporative, and dust emissions resulting from construction-related VMT, including personal vehicles for worker commuting.[4]

Specifically, in order to calculate VMT, CalEEMod multiplies the average daily trip rate by the average overall trip length (see excerpt below):

> "$VMT_d = \Sigma(\text{Average Daily Trip Rate}_i * \text{Average Overall Trip Length}_i)_n$
>
> Where:
>
> n = Number of land uses being modeled."[5]

Furthermore, to calculate the on-road emissions associated with worker trips, CalEEMod utilizes the following equation (see excerpt below):

> "$\text{Emissions}_{pollutant} = VMT * EF_{running,pollutant}$
>
> Where:
>
> $\text{Emissions}_{pollutant}$ = emissions from vehicle running for each pollutant
>
> VMT = vehicle miles traveled
>
> $EF_{running,pollutant}$ = emission factor for running emissions."[6]

Thus, there is a direct relationship between trip length and VMT, as well as a direct relationship between VMT and vehicle running emissions. In other words, when the trip length is increased, the VMT and vehicle running emissions increase as a result. Thus, vehicle running emissions can be reduced by decreasing the average overall trip length, by way of a local hire requirement or otherwise.

Default Worker Trip Parameters and Potential Local Hire Requirements

As previously discussed, the number, length, and vehicle class of worker trips are utilized by CalEEMod to calculate emissions associated with the on-road vehicle trips required to transport workers to and from the Project site during construction.[7] In order to understand how local hire requirements and associated worker trip length reductions impact GHG emissions calculations, it is important to consider the CalEEMod default worker trip parameters. CalEEMod provides recommended default values based on site-specific information, such as land use type, meteorological data, total lot acreage, project type and typical equipment associated with project type. If more specific project information is known, the user can change the default values and input project-specific values, but the California Environmental Quality Act ("CEQA") requires that such changes be justified by substantial evidence.[8] The default number of construction-related worker trips is calculated by multiplying the

[4] "Appendix A Calculation Details for CalEEMod." CAPCOA, October 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 14-15.
[5] "Appendix A Calculation Details for CalEEMod." CAPCOA, October 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 23.
[6] "Appendix A Calculation Details for CalEEMod." CAPCOA, October 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 15.
[7] "CalEEMod User's Guide." CAPCOA, November 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/01_user-39-s-guide2016-3-2_15november2017.pdf?sfvrsn=4, p. 34.
[8] CalEEMod User Guide, *available at:* http://www.caleemod.com/, p. 1, 9.

number of pieces of equipment for all phases by 1.25, with the exception of worker trips required for the building construction and architectural coating phases.[9] Furthermore, the worker trip vehicle class is a 50/25/25 percent mix of light duty autos, light duty truck class 1 and light duty truck class 2, respectively."[10] Finally, the default worker trip length is consistent with the length of the operational home-to-work vehicle trips.[11] The operational home-to-work vehicle trip lengths are:

> "[B]ased on the *location* and *urbanization* selected on the project characteristic screen. These values were *supplied by the air districts or use a default average for the state*. Each district (or county) also assigns trip lengths for urban and rural settings" (emphasis added). [12]

Thus, the default worker trip length is based on the location and urbanization level selected by the User when modeling emissions. The below table shows the CalEEMod default rural and urban worker trip lengths by air basin (see excerpt below and Attachment A).[13]

Worker Trip Length by Air Basin		
Air Basin	**Rural (miles)**	**Urban (miles)**
Great Basin Valleys	16.8	10.8
Lake County	16.8	10.8
Lake Tahoe	16.8	10.8
Mojave Desert	16.8	10.8
Mountain Counties	16.8	10.8
North Central Coast	17.1	12.3
North Coast	16.8	10.8
Northeast Plateau	16.8	10.8
Sacramento Valley	16.8	10.8
Salton Sea	14.6	11
San Diego	16.8	10.8
San Francisco Bay Area	10.8	10.8
San Joaquin Valley	16.8	10.8
South Central Coast	16.8	10.8
South Coast	19.8	14.7
Average	**16.47**	**11.17**
Minimum	**10.80**	**10.80**
Maximum	**19.80**	**14.70**
Range	**9.00**	**3.90**

[9] "CalEEMod User's Guide." CAPCOA, November 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/01_user-39-s-guide2016-3-2_15november2017.pdf?sfvrsn=4, p. 34.
[10] "Appendix A Calculation Details for CalEEMod." CAPCOA, October 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 15.
[11] "Appendix A Calculation Details for CalEEMod." CAPCOA, October 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 14.
[12] "Appendix A Calculation Details for CalEEMod." CAPCOA, October 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 21.
[13] "Appendix D Default Data Tables." CAPCOA, October 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/05_appendix-d2016-3-2.pdf?sfvrsn=4, p. D-84 – D-86.

As demonstrated above, default rural worker trip lengths for air basins in California vary from 10.8- to 19.8-miles, with an average of 16.47 miles. Furthermore, default urban worker trip lengths vary from 10.8- to 14.7-miles, with an average of 11.17 miles. Thus, while default worker trip lengths vary by location, default urban worker trip lengths tend to be shorter in length. Based on these trends evident in the CalEEMod default worker trip lengths, we can reasonably assume that the efficacy of a local hire requirement is especially dependent upon the urbanization of the project site, as well as the project location.

Practical Application of a Local Hire Requirement and Associated Impact

To provide an example of the potential impact of a local hire provision on construction-related GHG emissions, we estimated the significance of a local hire provision for the Village South Specific Plan ("Project") located in the City of Claremont ("City"). The Project proposed to construct 1,000 residential units, 100,000-SF of retail space, 45,000-SF of office space, as well as a 50-room hotel, on the 24-acre site. The Project location is classified as Urban and lies within the Los Angeles-South Coast County. As a result, the Project has a default worker trip length of 14.7 miles.[14] In an effort to evaluate the potential for a local hire provision to reduce the Project's construction-related GHG emissions, we prepared an updated model, reducing all worker trip lengths to 10 miles (see Attachment B). Our analysis estimates that if a local hire provision with a 10-mile radius were to be implemented, the GHG emissions associated with Project construction would decrease by approximately 17% (see table below and Attachment C).

Local Hire Provision Net Change	
Without Local Hire Provision	
Total Construction GHG Emissions (MT CO_2e)	3,623
Amortized Construction GHG Emissions (MT CO_2e/year)	120.77
With Local Hire Provision	
Total Construction GHG Emissions (MT CO2e)	3,024
Amortized Construction GHG Emissions (MT CO_2e/year)	100.80
% Decrease in Construction-related GHG Emissions	***17%***

As demonstrated above, by implementing a local hire provision requiring 10 mile worker trip lengths, the Project could reduce potential GHG emissions associated with construction worker trips. More broadly, any local hire requirement that results in a decreased worker trip length from the default value has the potential to result in a reduction of construction-related GHG emissions, though the significance of the reduction would vary based on the location and urbanization level of the project site.

This serves as an example of the potential impacts of local hire requirements on estimated project-level GHG emissions, though it does not indicate that local hire requirements would result in reduced construction-related GHG emission for all projects. As previously described, the significance of a local hire requirement depends on the worker trip length enforced and the default worker trip length for the project's urbanization level and location.

[14] "Appendix D Default Data Tables." CAPCOA, October 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/05_appendix-d2016-3-2.pdf?sfvrsn=4, p. D-85.

Disclaimer

SWAPE has received limited discovery. Additional information may become available in the future; thus, we retain the right to revise or amend this report when additional information becomes available. Our professional services have been performed using that degree of care and skill ordinarily exercised, under similar circumstances, by reputable environmental consultants practicing in this or similar localities at the time of service. No other warranty, expressed or implied, is made as to the scope of work, work methodologies and protocols, site conditions, analytical testing results, and findings presented. This report reflects efforts which were limited to information that was reasonably accessible at the time of the work, and may contain informational gaps, inconsistencies, or otherwise be incomplete due to the unavailability or uncertainty of information obtained or provided by third parties.

Sincerely,



Matt Hagemann, P.G., C.Hg.



Paul E. Rosenfeld, Ph.D.

Location Type	Location Name	Rural H-W (miles)	Urban H-W (miles)
Air Basin	Great Basin	16.8	10.8
Air Basin	Lake County	16.8	10.8
Air Basin	Lake Tahoe	16.8	10.8
Air Basin	Mojave Desert	16.8	10.8
Air Basin	Mountain	16.8	10.8
Air Basin	North Central	17.1	12.3
Air Basin	North Coast	16.8	10.8
Air Basin	Northeast	16.8	10.8
Air Basin	Sacramento	16.8	10.8
Air Basin	Salton Sea	14.6	11
Air Basin	San Diego	16.8	10.8
Air Basin	San Francisco	10.8	10.8
Air Basin	San Joaquin	16.8	10.8
Air Basin	South Central	16.8	10.8
Air Basin	South Coast	19.8	14.7
Air District	Amador County	16.8	10.8
Air District	Antelope Valley	16.8	10.8
Air District	Bay Area AQMD	10.8	10.8
Air District	Butte County	12.54	12.54
Air District	Calaveras	16.8	10.8
Air District	Colusa County	16.8	10.8
Air District	El Dorado	16.8	10.8
Air District	Feather River	16.8	10.8
Air District	Glenn County	16.8	10.8
Air District	Great Basin	16.8	10.8
Air District	Imperial County	10.2	7.3
Air District	Kern County	16.8	10.8
Air District	Lake County	16.8	10.8
Air District	Lassen County	16.8	10.8
Air District	Mariposa	16.8	10.8
Air District	Mendocino	16.8	10.8
Air District	Modoc County	16.8	10.8
Air District	Mojave Desert	16.8	10.8
Air District	Monterey Bay	16.8	10.8
Air District	North Coast	16.8	10.8
Air District	Northern Sierra	16.8	10.8
Air District	Northern	16.8	10.8
Air District	Placer County	16.8	10.8
Air District	Sacramento	15	10

Air District	San Diego	16.8	10.8
Air District	San Joaquin	16.8	10.8
Air District	San Luis Obispo	13	13
Air District	Santa Barbara	8.3	8.3
Air District	Shasta County	16.8	10.8
Air District	Siskiyou County	16.8	10.8
Air District	South Coast	19.8	14.7
Air District	Tehama County	16.8	10.8
Air District	Tuolumne	16.8	10.8
Air District	Ventura County	16.8	10.8
Air District	Yolo/Solano	15	10
County	Alameda	10.8	10.8
County	Alpine	16.8	10.8
County	Amador	16.8	10.8
County	Butte	12.54	12.54
County	Calaveras	16.8	10.8
County	Colusa	16.8	10.8
County	Contra Costa	10.8	10.8
County	Del Norte	16.8	10.8
County	El Dorado-Lake	16.8	10.8
County	El Dorado-	16.8	10.8
County	Fresno	16.8	10.8
County	Glenn	16.8	10.8
County	Humboldt	16.8	10.8
County	Imperial	10.2	7.3
County	Inyo	16.8	10.8
County	Kern-Mojave	16.8	10.8
County	Kern-San	16.8	10.8
County	Kings	16.8	10.8
County	Lake	16.8	10.8
County	Lassen	16.8	10.8
County	Los Angeles-	16.8	10.8
County	Los Angeles-	19.8	14.7
County	Madera	16.8	10.8
County	Marin	10.8	10.8
County	Mariposa	16.8	10.8
County	Mendocino-	16.8	10.8
County	Mendocino-	16.8	10.8
County	Mendocino-	16.8	10.8
County	Mendocino-	16.8	10.8
County	Merced	16.8	10.8
County	Modoc	16.8	10.8
County	Mono	16.8	10.8
County	Monterey	16.8	10.8
County	Napa	10.8	10.8

County	Nevada	16.8	10.8
County	Orange	19.8	14.7
County	Placer-Lake	16.8	10.8
County	Placer-Mountain	16.8	10.8
County	Placer-	16.8	10.8
County	Plumas	16.8	10.8
County	Riverside-	16.8	10.8
County	Riverside-	19.8	14.7
County	Riverside-Salton	14.6	11
County	Riverside-South	19.8	14.7
County	Sacramento	15	10
County	San Benito	16.8	10.8
County	San Bernardino-	16.8	10.8
County	San Bernardino-	19.8	14.7
County	San Diego	16.8	10.8
County	San Francisco	10.8	10.8
County	San Joaquin	16.8	10.8
County	San Luis Obispo	13	13
County	San Mateo	10.8	10.8
County	Santa Barbara-	8.3	8.3
County	Santa Barbara-	8.3	8.3
County	Santa Clara	10.8	10.8
County	Santa Cruz	16.8	10.8
County	Shasta	16.8	10.8
County	Sierra	16.8	10.8
County	Siskiyou	16.8	10.8
County	Solano-	15	10
County	Solano-San	16.8	10.8
County	Sonoma-North	16.8	10.8
County	Sonoma-San	10.8	10.8
County	Stanislaus	16.8	10.8
County	Sutter	16.8	10.8
County	Tehama	16.8	10.8
County	Trinity	16.8	10.8
County	Tulare	16.8	10.8
County	Tuolumne	16.8	10.8
County	Ventura	16.8	10.8
County	Yolo	15	10
County	Yuba	16.8	10.8
Statewide	Statewide	16.8	10.8

Worker Trip Length by Air Basin		
Air Basin	**Rural (miles)**	**Urban (miles)**
Great Basin Valleys	16.8	10.8
Lake County	16.8	10.8
Lake Tahoe	16.8	10.8
Mojave Desert	16.8	10.8
Mountain Counties	16.8	10.8
North Central Coast	17.1	12.3
North Coast	16.8	10.8
Northeast Plateau	16.8	10.8
Sacramento Valley	16.8	10.8
Salton Sea	14.6	11
San Diego	16.8	10.8
San Francisco Bay Area	10.8	10.8
San Joaquin Valley	16.8	10.8
South Central Coast	16.8	10.8
South Coast	19.8	14.7
Average	**16.47**	**11.17**
Mininum	**10.80**	**10.80**
Maximum	**19.80**	**14.70**
Range	**9.00**	**3.90**

Village South Specific Plan (Proposed)

Los Angeles-South Coast County, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
General Office Building	45.00	1000sqft	1.03	45,000.00	0
High Turnover (Sit Down Restaurant)	36.00	1000sqft	0.83	36,000.00	0
Hotel	50.00	Room	1.67	72,600.00	0
Quality Restaurant	8.00	1000sqft	0.18	8,000.00	0
Apartments Low Rise	25.00	Dwelling Unit	1.56	25,000.00	72
Apartments Mid Rise	975.00	Dwelling Unit	25.66	975,000.00	2789
Regional Shopping Center	56.00	1000sqft	1.29	56,000.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.2	**Precipitation Freq (Days)**	33
Climate Zone	9			**Operational Year**	2028
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	702.44	**CH4 Intensity (lb/MWhr)**	0.029	**N2O Intensity (lb/MWhr)**	0.006

1.3 User Entered Comments & Non-Default Data

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

Project Characteristics - Consistent with the DEIR's model.

Land Use - See SWAPE comment regarding residential and retail land uses.

Construction Phase - See SWAPE comment regarding individual construction phase lengths.

Demolition - Consistent with the DEIR's model. See SWAPE comment regarding demolition.

Vehicle Trips - Saturday trips consistent with the DEIR's model. See SWAPE comment regarding weekday and Sunday trips.

Woodstoves - Woodstoves and wood-burning fireplaces consistent with the DEIR's model. See SWAPE comment regarding gas fireplaces.

Energy Use -

Construction Off-road Equipment Mitigation - See SWAPE comment on construction-related mitigation.

Area Mitigation - See SWAPE comment regarding operational mitigation measures.

Water Mitigation - See SWAPE comment regarding operational mitigation measures.

Table Name	Column Name	Default Value	New Value
tblFireplaces	FireplaceWoodMass	1,019.20	0.00
tblFireplaces	FireplaceWoodMass	1,019.20	0.00
tblFireplaces	NumberWood	1.25	0.00
tblFireplaces	NumberWood	48.75	0.00
tblVehicleTrips	ST_TR	7.16	6.17
tblVehicleTrips	ST_TR	6.39	3.87
tblVehicleTrips	ST_TR	2.46	1.39
tblVehicleTrips	ST_TR	158.37	79.82
tblVehicleTrips	ST_TR	8.19	3.75
tblVehicleTrips	ST_TR	94.36	63.99
tblVehicleTrips	ST_TR	49.97	10.74
tblVehicleTrips	SU_TR	6.07	6.16
tblVehicleTrips	SU_TR	5.86	4.18
tblVehicleTrips	SU_TR	1.05	0.69
tblVehicleTrips	SU_TR	131.84	78.27

tblVehicleTrips	SU_TR	5.95	3.20
tblVehicleTrips	SU_TR	72.16	57.65
tblVehicleTrips	SU_TR	25.24	6.39
tblVehicleTrips	WD_TR	6.59	5.83
tblVehicleTrips	WD_TR	6.65	4.13
tblVehicleTrips	WD_TR	11.03	6.41
tblVehicleTrips	WD_TR	127.15	65.80
tblVehicleTrips	WD_TR	8.17	3.84
tblVehicleTrips	WD_TR	89.95	62.64
tblVehicleTrips	WD_TR	42.70	9.43
tblWoodstoves	NumberCatalytic	1.25	0.00
tblWoodstoves	NumberCatalytic	48.75	0.00
tblWoodstoves	NumberNoncatalytic	1.25	0.00
tblWoodstoves	NumberNoncatalytic	48.75	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00

2.0 Emissions Summary

2.1 Overall Construction

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2021	0.1713	1.8242	1.1662	2.4000e-003	0.4169	0.0817	0.4986	0.1795	0.0754	0.2549	0.0000	213.1969	213.1969	0.0601	0.0000	214.6993
2022	0.6904	4.1142	6.1625	0.0189	1.3058	0.1201	1.4259	0.3460	0.1128	0.4588	0.0000	1,721.6826	1,721.6826	0.1294	0.0000	1,724.9187
2023	0.6148	3.3649	5.6747	0.0178	1.1963	0.0996	1.2959	0.3203	0.0935	0.4138	0.0000	1,627.5295	1,627.5295	0.1185	0.0000	1,630.4925
2024	4.1619	0.1335	0.2810	5.9000e-004	0.0325	6.4700e-003	0.0390	8.6300e-003	6.0400e-003	0.0147	0.0000	52.9078	52.9078	8.0200e-003	0.0000	53.1082
Maximum	**4.1619**	**4.1142**	**6.1625**	**0.0189**	**1.3058**	**0.1201**	**1.4259**	**0.3460**	**0.1128**	**0.4588**	**0.0000**	**1,721.6826**	**1,721.6826**	**0.1294**	**0.0000**	**1,724.9187**

2.1 Overall Construction

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2021	0.1713	1.8242	1.1662	2.4000e-003	0.4169	0.0817	0.4986	0.1795	0.0754	0.2549	0.0000	213.1967	213.1967	0.0601	0.0000	214.6991
2022	0.6904	4.1142	6.1625	0.0189	1.3058	0.1201	1.4259	0.3460	0.1128	0.4588	0.0000	1,721.6823	1,721.6823	0.1294	0.0000	1,724.9183
2023	0.6148	3.3648	5.6747	0.0178	1.1963	0.0996	1.2959	0.3203	0.0935	0.4138	0.0000	1,627.5291	1,627.5291	0.1185	0.0000	1,630.4921
2024	4.1619	0.1335	0.2810	5.9000e-004	0.0325	6.4700e-003	0.0390	8.6300e-003	6.0400e-003	0.0147	0.0000	52.9077	52.9077	8.0200e-003	0.0000	53.1082
Maximum	**4.1619**	**4.1142**	**6.1625**	**0.0189**	**1.3058**	**0.1201**	**1.4259**	**0.3460**	**0.1128**	**0.4588**	**0.0000**	**1,721.6823**	**1,721.6823**	**0.1294**	**0.0000**	**1,724.9183**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
1	**9-1-2021**	**11-30-2021**	1.4103	1.4103
2	**12-1-2021**	**2-28-2022**	1.3613	1.3613
3	**3-1-2022**	**5-31-2022**	1.1985	1.1985
4	**6-1-2022**	**8-31-2022**	1.1921	1.1921
5	**9-1-2022**	**11-30-2022**	1.1918	1.1918
6	**12-1-2022**	**2-28-2023**	1.0774	1.0774
7	**3-1-2023**	**5-31-2023**	1.0320	1.0320
8	**6-1-2023**	**8-31-2023**	1.0260	1.0260

9	**9-1-2023**	**11-30-2023**	1.0265	1.0265
10	**12-1-2023**	**2-29-2024**	2.8857	2.8857
11	**3-1-2024**	**5-31-2024**	1.6207	1.6207
		Highest	2.8857	2.8857

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	5.1437	0.2950	10.3804	1.6700e-003		0.0714	0.0714		0.0714	0.0714	0.0000	220.9670	220.9670	0.0201	3.7400e-003	222.5835
Energy	0.1398	1.2312	0.7770	7.6200e-003		0.0966	0.0966		0.0966	0.0966	0.0000	3,896.0732	3,896.0732	0.1303	0.0468	3,913.2833
Mobile	1.5857	7.9962	19.1834	0.0821	7.7979	0.0580	7.8559	2.0895	0.0539	2.1434	0.0000	7,620.4986	7,620.4986	0.3407	0.0000	7,629.0162
Waste						0.0000	0.0000		0.0000	0.0000	207.8079	0.0000	207.8079	12.2811	0.0000	514.8354
Water						0.0000	0.0000		0.0000	0.0000	29.1632	556.6420	585.8052	3.0183	0.0755	683.7567
Total	**6.8692**	**9.5223**	**30.3407**	**0.0914**	**7.7979**	**0.2260**	**8.0240**	**2.0895**	**0.2219**	**2.3114**	**236.9712**	**12,294.1807**	**12,531.1519**	**15.7904**	**0.1260**	**12,963.4751**

2.2 Overall Operational

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	5.1437	0.2950	10.3804	1.6700e-003		0.0714	0.0714		0.0714	0.0714	0.0000	220.9670	220.9670	0.0201	3.7400e-003	222.5835
Energy	0.1398	1.2312	0.7770	7.6200e-003		0.0966	0.0966		0.0966	0.0966	0.0000	3,896.0732	3,896.0732	0.1303	0.0468	3,913.2833
Mobile	1.5857	7.9962	19.1834	0.0821	7.7979	0.0580	7.8559	2.0895	0.0539	2.1434	0.0000	7,620.4986	7,620.4986	0.3407	0.0000	7,629.0162
Waste						0.0000	0.0000		0.0000	0.0000	207.8079	0.0000	207.8079	12.2811	0.0000	514.8354
Water						0.0000	0.0000		0.0000	0.0000	29.1632	556.6420	585.8052	3.0183	0.0755	683.7567
Total	**6.8692**	**9.5223**	**30.3407**	**0.0914**	**7.7979**	**0.2260**	**8.0240**	**2.0895**	**0.2219**	**2.3114**	**236.9712**	**12,294.1807**	**12,531.1519**	**15.7904**	**0.1260**	**12,963.4751**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

3.0 Construction Detail

Construction Phase

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	9/1/2021	10/12/2021	5	30	
2	Site Preparation	Site Preparation	10/13/2021	11/9/2021	5	20	
3	Grading	Grading	11/10/2021	1/11/2022	5	45	
4	Building Construction	Building Construction	1/12/2022	12/12/2023	5	500	
5	Paving	Paving	12/13/2023	1/30/2024	5	35	
6	Architectural Coating	Architectural Coating	1/31/2024	3/19/2024	5	35	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 112.5

Acres of Paving: 0

Residential Indoor: 2,025,000; Residential Outdoor: 675,000; Non-Residential Indoor: 326,400; Non-Residential Outdoor: 108,800; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Demolition	Excavators	3	8.00	158	0.38
Demolition	Rubber Tired Dozers	2	8.00	247	0.40
Site Preparation	Rubber Tired Dozers	3	8.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	4	8.00	97	0.37
Grading	Excavators	2	8.00	158	0.38
Grading	Graders	1	8.00	187	0.41
Grading	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Scrapers	2	8.00	367	0.48
Grading	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Building Construction	Cranes	1	7.00	231	0.29
Building Construction	Forklifts	3	8.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	3	7.00	97	0.37
Building Construction	Welders	1	8.00	46	0.45
Paving	Pavers	2	8.00	130	0.42
Paving	Paving Equipment	2	8.00	132	0.36
Paving	Rollers	2	8.00	80	0.38
Architectural Coating	Air Compressors	1	6.00	78	0.48

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	6	15.00	0.00	458.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	7	18.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	8	20.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	801.00	143.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	160.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Demolition - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0496	0.0000	0.0496	7.5100e-003	0.0000	7.5100e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0475	0.4716	0.3235	5.8000e-004		0.0233	0.0233		0.0216	0.0216	0.0000	51.0012	51.0012	0.0144	0.0000	51.3601
Total	**0.0475**	**0.4716**	**0.3235**	**5.8000e-004**	**0.0496**	**0.0233**	**0.0729**	**7.5100e-003**	**0.0216**	**0.0291**	**0.0000**	**51.0012**	**51.0012**	**0.0144**	**0.0000**	**51.3601**

3.2 Demolition - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	1.9300e-003	0.0634	0.0148	1.8000e-004	3.9400e-003	1.9000e-004	4.1300e-003	1.0800e-003	1.8000e-004	1.2600e-003	0.0000	17.4566	17.4566	1.2100e-003	0.0000	17.4869
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	9.7000e-004	7.5000e-004	8.5100e-003	2.0000e-005	2.4700e-003	2.0000e-005	2.4900e-003	6.5000e-004	2.0000e-005	6.7000e-004	0.0000	2.2251	2.2251	7.0000e-005	0.0000	2.2267
Total	**2.9000e-003**	**0.0641**	**0.0233**	**2.0000e-004**	**6.4100e-003**	**2.1000e-004**	**6.6200e-003**	**1.7300e-003**	**2.0000e-004**	**1.9300e-003**	**0.0000**	**19.6816**	**19.6816**	**1.2800e-003**	**0.0000**	**19.7136**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0496	0.0000	0.0496	7.5100e-003	0.0000	7.5100e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0475	0.4716	0.3235	5.8000e-004		0.0233	0.0233		0.0216	0.0216	0.0000	51.0011	51.0011	0.0144	0.0000	51.3600
Total	**0.0475**	**0.4716**	**0.3235**	**5.8000e-004**	**0.0496**	**0.0233**	**0.0729**	**7.5100e-003**	**0.0216**	**0.0291**	**0.0000**	**51.0011**	**51.0011**	**0.0144**	**0.0000**	**51.3600**

3.2 Demolition - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	1.9300e-003	0.0634	0.0148	1.8000e-004	3.9400e-003	1.9000e-004	4.1300e-003	1.0800e-003	1.8000e-004	1.2600e-003	0.0000	17.4566	17.4566	1.2100e-003	0.0000	17.4869
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	9.7000e-004	7.5000e-004	8.5100e-003	2.0000e-005	2.4700e-003	2.0000e-005	2.4900e-003	6.5000e-004	2.0000e-005	6.7000e-004	0.0000	2.2251	2.2251	7.0000e-005	0.0000	2.2267
Total	**2.9000e-003**	**0.0641**	**0.0233**	**2.0000e-004**	**6.4100e-003**	**2.1000e-004**	**6.6200e-003**	**1.7300e-003**	**2.0000e-004**	**1.9300e-003**	**0.0000**	**19.6816**	**19.6816**	**1.2800e-003**	**0.0000**	**19.7136**

3.3 Site Preparation - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.1807	0.0000	0.1807	0.0993	0.0000	0.0993	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0389	0.4050	0.2115	3.8000e-004		0.0204	0.0204		0.0188	0.0188	0.0000	33.4357	33.4357	0.0108	0.0000	33.7061
Total	**0.0389**	**0.4050**	**0.2115**	**3.8000e-004**	**0.1807**	**0.0204**	**0.2011**	**0.0993**	**0.0188**	**0.1181**	**0.0000**	**33.4357**	**33.4357**	**0.0108**	**0.0000**	**33.7061**

3.3 Site Preparation - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	7.7000e-004	6.0000e-004	6.8100e-003	2.0000e-005	1.9700e-003	2.0000e-005	1.9900e-003	5.2000e-004	1.0000e-005	5.4000e-004	0.0000	1.7801	1.7801	5.0000e-005	0.0000	1.7814
Total	**7.7000e-004**	**6.0000e-004**	**6.8100e-003**	**2.0000e-005**	**1.9700e-003**	**2.0000e-005**	**1.9900e-003**	**5.2000e-004**	**1.0000e-005**	**5.4000e-004**	**0.0000**	**1.7801**	**1.7801**	**5.0000e-005**	**0.0000**	**1.7814**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.1807	0.0000	0.1807	0.0993	0.0000	0.0993	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0389	0.4050	0.2115	3.8000e-004		0.0204	0.0204		0.0188	0.0188	0.0000	33.4357	33.4357	0.0108	0.0000	33.7060
Total	**0.0389**	**0.4050**	**0.2115**	**3.8000e-004**	**0.1807**	**0.0204**	**0.2011**	**0.0993**	**0.0188**	**0.1181**	**0.0000**	**33.4357**	**33.4357**	**0.0108**	**0.0000**	**33.7060**

3.3 Site Preparation - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	7.7000e-004	6.0000e-004	6.8100e-003	2.0000e-005	1.9700e-003	2.0000e-005	1.9900e-003	5.2000e-004	1.0000e-005	5.4000e-004	0.0000	1.7801	1.7801	5.0000e-005	0.0000	1.7814
Total	**7.7000e-004**	**6.0000e-004**	**6.8100e-003**	**2.0000e-005**	**1.9700e-003**	**2.0000e-005**	**1.9900e-003**	**5.2000e-004**	**1.0000e-005**	**5.4000e-004**	**0.0000**	**1.7801**	**1.7801**	**5.0000e-005**	**0.0000**	**1.7814**

3.4 Grading - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.1741	0.0000	0.1741	0.0693	0.0000	0.0693	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0796	0.8816	0.5867	1.1800e-003		0.0377	0.0377		0.0347	0.0347	0.0000	103.5405	103.5405	0.0335	0.0000	104.3776
Total	**0.0796**	**0.8816**	**0.5867**	**1.1800e-003**	**0.1741**	**0.0377**	**0.2118**	**0.0693**	**0.0347**	**0.1040**	**0.0000**	**103.5405**	**103.5405**	**0.0335**	**0.0000**	**104.3776**

3.4 Grading - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.6400e-003	1.2700e-003	0.0144	4.0000e-005	4.1600e-003	3.0000e-005	4.2000e-003	1.1100e-003	3.0000e-005	1.1400e-003	0.0000	3.7579	3.7579	1.1000e-004	0.0000	3.7607
Total	**1.6400e-003**	**1.2700e-003**	**0.0144**	**4.0000e-005**	**4.1600e-003**	**3.0000e-005**	**4.2000e-003**	**1.1100e-003**	**3.0000e-005**	**1.1400e-003**	**0.0000**	**3.7579**	**3.7579**	**1.1000e-004**	**0.0000**	**3.7607**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.1741	0.0000	0.1741	0.0693	0.0000	0.0693	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0796	0.8816	0.5867	1.1800e-003		0.0377	0.0377		0.0347	0.0347	0.0000	103.5403	103.5403	0.0335	0.0000	104.3775
Total	**0.0796**	**0.8816**	**0.5867**	**1.1800e-003**	**0.1741**	**0.0377**	**0.2118**	**0.0693**	**0.0347**	**0.1040**	**0.0000**	**103.5403**	**103.5403**	**0.0335**	**0.0000**	**104.3775**

3.4 Grading - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.6400e-003	1.2700e-003	0.0144	4.0000e-005	4.1600e-003	3.0000e-005	4.2000e-003	1.1100e-003	3.0000e-005	1.1400e-003	0.0000	3.7579	3.7579	1.1000e-004	0.0000	3.7607
Total	**1.6400e-003**	**1.2700e-003**	**0.0144**	**4.0000e-005**	**4.1600e-003**	**3.0000e-005**	**4.2000e-003**	**1.1100e-003**	**3.0000e-005**	**1.1400e-003**	**0.0000**	**3.7579**	**3.7579**	**1.1000e-004**	**0.0000**	**3.7607**

3.4 Grading - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0807	0.0000	0.0807	0.0180	0.0000	0.0180	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0127	0.1360	0.1017	2.2000e-004		5.7200e-003	5.7200e-003		5.2600e-003	5.2600e-003	0.0000	19.0871	19.0871	6.1700e-003	0.0000	19.2414
Total	**0.0127**	**0.1360**	**0.1017**	**2.2000e-004**	**0.0807**	**5.7200e-003**	**0.0865**	**0.0180**	**5.2600e-003**	**0.0233**	**0.0000**	**19.0871**	**19.0871**	**6.1700e-003**	**0.0000**	**19.2414**

3.4 Grading - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.8000e-004	2.1000e-004	2.4400e-003	1.0000e-005	7.7000e-004	1.0000e-005	7.7000e-004	2.0000e-004	1.0000e-005	2.1000e-004	0.0000	0.6679	0.6679	2.0000e-005	0.0000	0.6684
Total	**2.8000e-004**	**2.1000e-004**	**2.4400e-003**	**1.0000e-005**	**7.7000e-004**	**1.0000e-005**	**7.7000e-004**	**2.0000e-004**	**1.0000e-005**	**2.1000e-004**	**0.0000**	**0.6679**	**0.6679**	**2.0000e-005**	**0.0000**	**0.6684**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0807	0.0000	0.0807	0.0180	0.0000	0.0180	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0127	0.1360	0.1017	2.2000e-004		5.7200e-003	5.7200e-003		5.2600e-003	5.2600e-003	0.0000	19.0871	19.0871	6.1700e-003	0.0000	19.2414
Total	**0.0127**	**0.1360**	**0.1017**	**2.2000e-004**	**0.0807**	**5.7200e-003**	**0.0865**	**0.0180**	**5.2600e-003**	**0.0233**	**0.0000**	**19.0871**	**19.0871**	**6.1700e-003**	**0.0000**	**19.2414**

3.4 Grading - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.8000e-004	2.1000e-004	2.4400e-003	1.0000e-005	7.7000e-004	1.0000e-005	7.7000e-004	2.0000e-004	1.0000e-005	2.1000e-004	0.0000	0.6679	0.6679	2.0000e-005	0.0000	0.6684
Total	**2.8000e-004**	**2.1000e-004**	**2.4400e-003**	**1.0000e-005**	**7.7000e-004**	**1.0000e-005**	**7.7000e-004**	**2.0000e-004**	**1.0000e-005**	**2.1000e-004**	**0.0000**	**0.6679**	**0.6679**	**2.0000e-005**	**0.0000**	**0.6684**

3.5 Building Construction - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.2158	1.9754	2.0700	3.4100e-003		0.1023	0.1023		0.0963	0.0963	0.0000	293.1324	293.1324	0.0702	0.0000	294.8881
Total	**0.2158**	**1.9754**	**2.0700**	**3.4100e-003**		**0.1023**	**0.1023**		**0.0963**	**0.0963**	**0.0000**	**293.1324**	**293.1324**	**0.0702**	**0.0000**	**294.8881**

3.5 Building Construction - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0527	1.6961	0.4580	4.5500e-003	0.1140	3.1800e-003	0.1171	0.0329	3.0400e-003	0.0359	0.0000	441.9835	441.9835	0.0264	0.0000	442.6435
Worker	0.4088	0.3066	3.5305	0.0107	1.1103	8.8700e-003	1.1192	0.2949	8.1700e-003	0.3031	0.0000	966.8117	966.8117	0.0266	0.0000	967.4773
Total	**0.4616**	**2.0027**	**3.9885**	**0.0152**	**1.2243**	**0.0121**	**1.2363**	**0.3278**	**0.0112**	**0.3390**	**0.0000**	**1,408.7952**	**1,408.7952**	**0.0530**	**0.0000**	**1,410.1208**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.2158	1.9754	2.0700	3.4100e-003		0.1023	0.1023		0.0963	0.0963	0.0000	293.1321	293.1321	0.0702	0.0000	294.8877
Total	**0.2158**	**1.9754**	**2.0700**	**3.4100e-003**		**0.1023**	**0.1023**		**0.0963**	**0.0963**	**0.0000**	**293.1321**	**293.1321**	**0.0702**	**0.0000**	**294.8877**

3.5 Building Construction - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0527	1.6961	0.4580	4.5500e-003	0.1140	3.1800e-003	0.1171	0.0329	3.0400e-003	0.0359	0.0000	441.9835	441.9835	0.0264	0.0000	442.6435
Worker	0.4088	0.3066	3.5305	0.0107	1.1103	8.8700e-003	1.1192	0.2949	8.1700e-003	0.3031	0.0000	966.8117	966.8117	0.0266	0.0000	967.4773
Total	**0.4616**	**2.0027**	**3.9885**	**0.0152**	**1.2243**	**0.0121**	**1.2363**	**0.3278**	**0.0112**	**0.3390**	**0.0000**	**1,408.7952**	**1,408.7952**	**0.0530**	**0.0000**	**1,410.1208**

3.5 Building Construction - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1942	1.7765	2.0061	3.3300e-003		0.0864	0.0864		0.0813	0.0813	0.0000	286.2789	286.2789	0.0681	0.0000	287.9814
Total	**0.1942**	**1.7765**	**2.0061**	**3.3300e-003**		**0.0864**	**0.0864**		**0.0813**	**0.0813**	**0.0000**	**286.2789**	**286.2789**	**0.0681**	**0.0000**	**287.9814**

3.5 Building Construction - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0382	1.2511	0.4011	4.3000e-003	0.1113	1.4600e-003	0.1127	0.0321	1.4000e-003	0.0335	0.0000	417.9930	417.9930	0.0228	0.0000	418.5624
Worker	0.3753	0.2708	3.1696	0.0101	1.0840	8.4100e-003	1.0924	0.2879	7.7400e-003	0.2957	0.0000	909.3439	909.3439	0.0234	0.0000	909.9291
Total	**0.4135**	**1.5218**	**3.5707**	**0.0144**	**1.1953**	**9.8700e-003**	**1.2051**	**0.3200**	**9.1400e-003**	**0.3292**	**0.0000**	**1,327.3369**	**1,327.3369**	**0.0462**	**0.0000**	**1,328.4916**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1942	1.7765	2.0061	3.3300e-003		0.0864	0.0864		0.0813	0.0813	0.0000	286.2785	286.2785	0.0681	0.0000	287.9811
Total	**0.1942**	**1.7765**	**2.0061**	**3.3300e-003**		**0.0864**	**0.0864**		**0.0813**	**0.0813**	**0.0000**	**286.2785**	**286.2785**	**0.0681**	**0.0000**	**287.9811**

3.5 Building Construction - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0382	1.2511	0.4011	4.3000e-003	0.1113	1.4600e-003	0.1127	0.0321	1.4000e-003	0.0335	0.0000	417.9930	417.9930	0.0228	0.0000	418.5624
Worker	0.3753	0.2708	3.1696	0.0101	1.0840	8.4100e-003	1.0924	0.2879	7.7400e-003	0.2957	0.0000	909.3439	909.3439	0.0234	0.0000	909.9291
Total	**0.4135**	**1.5218**	**3.5707**	**0.0144**	**1.1953**	**9.8700e-003**	**1.2051**	**0.3200**	**9.1400e-003**	**0.3292**	**0.0000**	**1,327.3369**	**1,327.3369**	**0.0462**	**0.0000**	**1,328.4916**

3.6 Paving - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	6.7100e-003	0.0663	0.0948	1.5000e-004		3.3200e-003	3.3200e-003		3.0500e-003	3.0500e-003	0.0000	13.0175	13.0175	4.2100e-003	0.0000	13.1227
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**6.7100e-003**	**0.0663**	**0.0948**	**1.5000e-004**		**3.3200e-003**	**3.3200e-003**		**3.0500e-003**	**3.0500e-003**	**0.0000**	**13.0175**	**13.0175**	**4.2100e-003**	**0.0000**	**13.1227**

3.6 Paving - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	3.7000e-004	2.7000e-004	3.1200e-003	1.0000e-005	1.0700e-003	1.0000e-005	1.0800e-003	2.8000e-004	1.0000e-005	2.9000e-004	0.0000	0.8963	0.8963	2.0000e-005	0.0000	0.8968
Total	**3.7000e-004**	**2.7000e-004**	**3.1200e-003**	**1.0000e-005**	**1.0700e-003**	**1.0000e-005**	**1.0800e-003**	**2.8000e-004**	**1.0000e-005**	**2.9000e-004**	**0.0000**	**0.8963**	**0.8963**	**2.0000e-005**	**0.0000**	**0.8968**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	6.7100e-003	0.0663	0.0948	1.5000e-004		3.3200e-003	3.3200e-003		3.0500e-003	3.0500e-003	0.0000	13.0175	13.0175	4.2100e-003	0.0000	13.1227
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**6.7100e-003**	**0.0663**	**0.0948**	**1.5000e-004**		**3.3200e-003**	**3.3200e-003**		**3.0500e-003**	**3.0500e-003**	**0.0000**	**13.0175**	**13.0175**	**4.2100e-003**	**0.0000**	**13.1227**

3.6 Paving - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	3.7000e-004	2.7000e-004	3.1200e-003	1.0000e-005	1.0700e-003	1.0000e-005	1.0800e-003	2.8000e-004	1.0000e-005	2.9000e-004	0.0000	0.8963	0.8963	2.0000e-005	0.0000	0.8968
Total	**3.7000e-004**	**2.7000e-004**	**3.1200e-003**	**1.0000e-005**	**1.0700e-003**	**1.0000e-005**	**1.0800e-003**	**2.8000e-004**	**1.0000e-005**	**2.9000e-004**	**0.0000**	**0.8963**	**0.8963**	**2.0000e-005**	**0.0000**	**0.8968**

3.6 Paving - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0109	0.1048	0.1609	2.5000e-004		5.1500e-003	5.1500e-003		4.7400e-003	4.7400e-003	0.0000	22.0292	22.0292	7.1200e-003	0.0000	22.2073
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0109**	**0.1048**	**0.1609**	**2.5000e-004**		**5.1500e-003**	**5.1500e-003**		**4.7400e-003**	**4.7400e-003**	**0.0000**	**22.0292**	**22.0292**	**7.1200e-003**	**0.0000**	**22.2073**

3.6 Paving - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.9000e-004	4.1000e-004	4.9200e-003	2.0000e-005	1.8100e-003	1.0000e-005	1.8200e-003	4.8000e-004	1.0000e-005	4.9000e-004	0.0000	1.4697	1.4697	4.0000e-005	0.0000	1.4706
Total	**5.9000e-004**	**4.1000e-004**	**4.9200e-003**	**2.0000e-005**	**1.8100e-003**	**1.0000e-005**	**1.8200e-003**	**4.8000e-004**	**1.0000e-005**	**4.9000e-004**	**0.0000**	**1.4697**	**1.4697**	**4.0000e-005**	**0.0000**	**1.4706**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0109	0.1048	0.1609	2.5000e-004		5.1500e-003	5.1500e-003		4.7400e-003	4.7400e-003	0.0000	22.0292	22.0292	7.1200e-003	0.0000	22.2073
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0109**	**0.1048**	**0.1609**	**2.5000e-004**		**5.1500e-003**	**5.1500e-003**		**4.7400e-003**	**4.7400e-003**	**0.0000**	**22.0292**	**22.0292**	**7.1200e-003**	**0.0000**	**22.2073**

3.6 Paving - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.9000e-004	4.1000e-004	4.9200e-003	2.0000e-005	1.8100e-003	1.0000e-005	1.8200e-003	4.8000e-004	1.0000e-005	4.9000e-004	0.0000	1.4697	1.4697	4.0000e-005	0.0000	1.4706
Total	**5.9000e-004**	**4.1000e-004**	**4.9200e-003**	**2.0000e-005**	**1.8100e-003**	**1.0000e-005**	**1.8200e-003**	**4.8000e-004**	**1.0000e-005**	**4.9000e-004**	**0.0000**	**1.4697**	**1.4697**	**4.0000e-005**	**0.0000**	**1.4706**

3.7 Architectural Coating - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	4.1372					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	3.1600e-003	0.0213	0.0317	5.0000e-005		1.0700e-003	1.0700e-003		1.0700e-003	1.0700e-003	0.0000	4.4682	4.4682	2.5000e-004	0.0000	4.4745
Total	**4.1404**	**0.0213**	**0.0317**	**5.0000e-005**		**1.0700e-003**	**1.0700e-003**		**1.0700e-003**	**1.0700e-003**	**0.0000**	**4.4682**	**4.4682**	**2.5000e-004**	**0.0000**	**4.4745**

3.7 Architectural Coating - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0101	6.9900e-003	0.0835	2.8000e-004	0.0307	2.3000e-004	0.0309	8.1500e-003	2.2000e-004	8.3700e-003	0.0000	24.9407	24.9407	6.1000e-004	0.0000	24.9558
Total	**0.0101**	**6.9900e-003**	**0.0835**	**2.8000e-004**	**0.0307**	**2.3000e-004**	**0.0309**	**8.1500e-003**	**2.2000e-004**	**8.3700e-003**	**0.0000**	**24.9407**	**24.9407**	**6.1000e-004**	**0.0000**	**24.9558**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	4.1372					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	3.1600e-003	0.0213	0.0317	5.0000e-005		1.0700e-003	1.0700e-003		1.0700e-003	1.0700e-003	0.0000	4.4682	4.4682	2.5000e-004	0.0000	4.4745
Total	**4.1404**	**0.0213**	**0.0317**	**5.0000e-005**		**1.0700e-003**	**1.0700e-003**		**1.0700e-003**	**1.0700e-003**	**0.0000**	**4.4682**	**4.4682**	**2.5000e-004**	**0.0000**	**4.4745**

3.7 Architectural Coating - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0101	6.9900e-003	0.0835	2.8000e-004	0.0307	2.3000e-004	0.0309	8.1500e-003	2.2000e-004	8.3700e-003	0.0000	24.9407	24.9407	6.1000e-004	0.0000	24.9558
Total	**0.0101**	**6.9900e-003**	**0.0835**	**2.8000e-004**	**0.0307**	**2.3000e-004**	**0.0309**	**8.1500e-003**	**2.2000e-004**	**8.3700e-003**	**0.0000**	**24.9407**	**24.9407**	**6.1000e-004**	**0.0000**	**24.9558**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	1.5857	7.9962	19.1834	0.0821	7.7979	0.0580	7.8559	2.0895	0.0539	2.1434	0.0000	7,620.4986	7,620.4986	0.3407	0.0000	7,629.0162
Unmitigated	1.5857	7.9962	19.1834	0.0821	7.7979	0.0580	7.8559	2.0895	0.0539	2.1434	0.0000	7,620.4986	7,620.4986	0.3407	0.0000	7,629.0162

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Apartments Low Rise	145.75	154.25	154.00	506,227	506,227
Apartments Mid Rise	4,026.75	3,773.25	4075.50	13,660,065	13,660,065
General Office Building	288.45	62.55	31.05	706,812	706,812
High Turnover (Sit Down Restaurant)	2,368.80	2,873.52	2817.72	3,413,937	3,413,937
Hotel	192.00	187.50	160.00	445,703	445,703
Quality Restaurant	501.12	511.92	461.20	707,488	707,488
Regional Shopping Center	528.08	601.44	357.84	1,112,221	1,112,221
Total	8,050.95	8,164.43	8,057.31	20,552,452	20,552,452

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Apartments Low Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3
Apartments Mid Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3
General Office Building	16.60	8.40	6.90	33.00	48.00	19.00	77	19	4
High Turnover (Sit Down	16.60	8.40	6.90	8.50	72.50	19.00	37	20	43
Hotel	16.60	8.40	6.90	19.40	61.60	19.00	58	38	4
Quality Restaurant	16.60	8.40	6.90	12.00	69.00	19.00	38	18	44
Regional Shopping Center	16.60	8.40	6.90	16.30	64.70	19.00	54	35	11

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Apartments Low Rise	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Apartments Mid Rise	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
General Office Building	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
High Turnover (Sit Down Restaurant)	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Hotel	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Quality Restaurant	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Regional Shopping Center	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	2,512.6465	2,512.6465	0.1037	0.0215	2,521.6356
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	2,512.6465	2,512.6465	0.1037	0.0215	2,521.6356
NaturalGas Mitigated	0.1398	1.2312	0.7770	7.6200e-003		0.0966	0.0966		0.0966	0.0966	0.0000	1,383.4267	1,383.4267	0.0265	0.0254	1,391.6478
NaturalGas Unmitigated	0.1398	1.2312	0.7770	7.6200e-003		0.0966	0.0966		0.0966	0.0966	0.0000	1,383.4267	1,383.4267	0.0265	0.0254	1,391.6478

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Apartments Low Rise	408494	2.2000e-003	0.0188	8.0100e-003	1.2000e-004		1.5200e-003	1.5200e-003		1.5200e-003	1.5200e-003	0.0000	21.7988	21.7988	4.2000e-004	4.0000e-004	21.9284
Apartments Mid Rise	1.30613e+007	0.0704	0.6018	0.2561	3.8400e-003		0.0487	0.0487		0.0487	0.0487	0.0000	696.9989	696.9989	0.0134	0.0128	701.1408
General Office Building	468450	2.5300e-003	0.0230	0.0193	1.4000e-004		1.7500e-003	1.7500e-003		1.7500e-003	1.7500e-003	0.0000	24.9983	24.9983	4.8000e-004	4.6000e-004	25.1468
High Turnover (Sit Down Restaurant)	8.30736e+006	0.0448	0.4072	0.3421	2.4400e-003		0.0310	0.0310		0.0310	0.0310	0.0000	443.3124	443.3124	8.5000e-003	8.1300e-003	445.9468
Hotel	1.74095e+006	9.3900e-003	0.0853	0.0717	5.1000e-004		6.4900e-003	6.4900e-003		6.4900e-003	6.4900e-003	0.0000	92.9036	92.9036	1.7800e-003	1.7000e-003	93.4557
Quality Restaurant	1.84608e+006	9.9500e-003	0.0905	0.0760	5.4000e-004		6.8800e-003	6.8800e-003		6.8800e-003	6.8800e-003	0.0000	98.5139	98.5139	1.8900e-003	1.8100e-003	99.0993
Regional Shopping Center	91840	5.0000e-004	4.5000e-003	3.7800e-003	3.0000e-005		3.4000e-004	3.4000e-004		3.4000e-004	3.4000e-004	0.0000	4.9009	4.9009	9.0000e-005	9.0000e-005	4.9301
Total		**0.1398**	**1.2312**	**0.7770**	**7.6200e-003**		**0.0966**	**0.0966**		**0.0966**	**0.0966**	**0.0000**	**1,383.4268**	**1,383.4268**	**0.0265**	**0.0254**	**1,391.6478**

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Apartments Low Rise	408494	2.2000e-003	0.0188	8.0100e-003	1.2000e-004		1.5200e-003	1.5200e-003		1.5200e-003	1.5200e-003	0.0000	21.7988	21.7988	4.2000e-004	4.0000e-004	21.9284
Apartments Mid Rise	1.30613e+007	0.0704	0.6018	0.2561	3.8400e-003		0.0487	0.0487		0.0487	0.0487	0.0000	696.9989	696.9989	0.0134	0.0128	701.1408
General Office Building	468450	2.5300e-003	0.0230	0.0193	1.4000e-004		1.7500e-003	1.7500e-003		1.7500e-003	1.7500e-003	0.0000	24.9983	24.9983	4.8000e-004	4.6000e-004	25.1468
High Turnover (Sit Down Restaurant)	8.30736e+006	0.0448	0.4072	0.3421	2.4400e-003		0.0310	0.0310		0.0310	0.0310	0.0000	443.3124	443.3124	8.5000e-003	8.1300e-003	445.9468
Hotel	1.74095e+006	9.3900e-003	0.0853	0.0717	5.1000e-004		6.4900e-003	6.4900e-003		6.4900e-003	6.4900e-003	0.0000	92.9036	92.9036	1.7800e-003	1.7000e-003	93.4557
Quality Restaurant	1.84608e+006	9.9500e-003	0.0905	0.0760	5.4000e-004		6.8800e-003	6.8800e-003		6.8800e-003	6.8800e-003	0.0000	98.5139	98.5139	1.8900e-003	1.8100e-003	99.0993
Regional Shopping Center	91840	5.0000e-004	4.5000e-003	3.7800e-003	3.0000e-005		3.4000e-004	3.4000e-004		3.4000e-004	3.4000e-004	0.0000	4.9009	4.9009	9.0000e-005	9.0000e-005	4.9301
Total		**0.1398**	**1.2312**	**0.7770**	**7.6200e-003**		**0.0966**	**0.0966**		**0.0966**	**0.0966**	**0.0000**	**1,383.4268**	**1,383.4268**	**0.0265**	**0.0254**	**1,391.6478**

5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Apartments Low Rise	106010	33.7770	1.3900e-003	2.9000e-004	33.8978
Apartments Mid Rise	3.94697e+006	1,257.5879	0.0519	0.0107	1,262.0869
General Office Building	584550	186.2502	7.6900e-003	1.5900e-003	186.9165
High Turnover (Sit Down Restaurant)	1.58904e+006	506.3022	0.0209	4.3200e-003	508.1135
Hotel	550308	175.3399	7.2400e-003	1.5000e-003	175.9672
Quality Restaurant	353120	112.5116	4.6500e-003	9.6000e-004	112.9141
Regional Shopping Center	756000	240.8778	9.9400e-003	2.0600e-003	241.7395
Total		**2,512.6465**	**0.1037**	**0.0215**	**2,521.6356**

5.3 Energy by Land Use - Electricity

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Apartments Low Rise	106010	33.7770	1.3900e-003	2.9000e-004	33.8978
Apartments Mid Rise	3.94697e+006	1,257.5879	0.0519	0.0107	1,262.0869
General Office Building	584550	186.2502	7.6900e-003	1.5900e-003	186.9165
High Turnover (Sit Down Restaurant)	1.58904e+006	506.3022	0.0209	4.3200e-003	508.1135
Hotel	550308	175.3399	7.2400e-003	1.5000e-003	175.9672
Quality Restaurant	353120	112.5116	4.6500e-003	9.6000e-004	112.9141
Regional Shopping Center	756000	240.8778	9.9400e-003	2.0600e-003	241.7395
Total		**2,512.6465**	**0.1037**	**0.0215**	**2,521.6356**

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	5.1437	0.2950	10.3804	1.6700e-003		0.0714	0.0714		0.0714	0.0714	0.0000	220.9670	220.9670	0.0201	3.7400e-003	222.5835
Unmitigated	5.1437	0.2950	10.3804	1.6700e-003		0.0714	0.0714		0.0714	0.0714	0.0000	220.9670	220.9670	0.0201	3.7400e-003	222.5835

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.4137					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	4.3998					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	0.0206	0.1763	0.0750	1.1200e-003		0.0143	0.0143		0.0143	0.0143	0.0000	204.1166	204.1166	3.9100e-003	3.7400e-003	205.3295
Landscaping	0.3096	0.1187	10.3054	5.4000e-004		0.0572	0.0572		0.0572	0.0572	0.0000	16.8504	16.8504	0.0161	0.0000	17.2540
Total	**5.1437**	**0.2950**	**10.3804**	**1.6600e-003**		**0.0714**	**0.0714**		**0.0714**	**0.0714**	**0.0000**	**220.9670**	**220.9670**	**0.0201**	**3.7400e-003**	**222.5835**

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.4137					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	4.3998					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	0.0206	0.1763	0.0750	1.1200e-003		0.0143	0.0143		0.0143	0.0143	0.0000	204.1166	204.1166	3.9100e-003	3.7400e-003	205.3295
Landscaping	0.3096	0.1187	10.3054	5.4000e-004		0.0572	0.0572		0.0572	0.0572	0.0000	16.8504	16.8504	0.0161	0.0000	17.2540
Total	**5.1437**	**0.2950**	**10.3804**	**1.6600e-003**		**0.0714**	**0.0714**		**0.0714**	**0.0714**	**0.0000**	**220.9670**	**220.9670**	**0.0201**	**3.7400e-003**	**222.5835**

7.0 Water Detail

7.1 Mitigation Measures Water

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	585.8052	3.0183	0.0755	683.7567
Unmitigated	585.8052	3.0183	0.0755	683.7567

7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Apartments Low Rise	1.62885 / 1.02688	10.9095	0.0535	1.3400e-003	12.6471
Apartments Mid Rise	63.5252 / 40.0485	425.4719	2.0867	0.0523	493.2363
General Office Building	7.99802 / 4.90201	53.0719	0.2627	6.5900e-003	61.6019
High Turnover (Sit Down Restaurant)	10.9272 / 0.697482	51.2702	0.3580	8.8200e-003	62.8482
Hotel	1.26834 / 0.140927	6.1633	0.0416	1.0300e-003	7.5079
Quality Restaurant	2.42827 / 0.154996	11.3934	0.0796	1.9600e-003	13.9663
Regional Shopping Center	4.14806 / 2.54236	27.5250	0.1363	3.4200e-003	31.9490
Total		**585.8052**	**3.0183**	**0.0755**	**683.7567**

7.2 Water by Land Use

Mitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Apartments Low Rise	1.62885 / 1.02688	10.9095	0.0535	1.3400e-003	12.6471
Apartments Mid Rise	63.5252 / 40.0485	425.4719	2.0867	0.0523	493.2363
General Office Building	7.99802 / 4.90201	53.0719	0.2627	6.5900e-003	61.6019
High Turnover (Sit Down Restaurant)	10.9272 / 0.697482	51.2702	0.3580	8.8200e-003	62.8482
Hotel	1.26834 / 0.140927	6.1633	0.0416	1.0300e-003	7.5079
Quality Restaurant	2.42827 / 0.154996	11.3934	0.0796	1.9600e-003	13.9663
Regional Shopping Center	4.14806 / 2.54236	27.5250	0.1363	3.4200e-003	31.9490
Total		**585.8052**	**3.0183**	**0.0755**	**683.7567**

8.0 Waste Detail

8.1 Mitigation Measures Waste

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	207.8079	12.2811	0.0000	514.8354
Unmitigated	207.8079	12.2811	0.0000	514.8354

8.2 Waste by Land Use

Unmitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Apartments Low Rise	11.5	2.3344	0.1380	0.0000	5.7834
Apartments Mid Rise	448.5	91.0415	5.3804	0.0000	225.5513
General Office Building	41.85	8.4952	0.5021	0.0000	21.0464
High Turnover (Sit Down Restaurant)	428.4	86.9613	5.1393	0.0000	215.4430
Hotel	27.38	5.5579	0.3285	0.0000	13.7694
Quality Restaurant	7.3	1.4818	0.0876	0.0000	3.6712
Regional Shopping Center	58.8	11.9359	0.7054	0.0000	29.5706
Total		**207.8079**	**12.2811**	**0.0000**	**514.8354**

8.2 Waste by Land Use

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Apartments Low Rise	11.5	2.3344	0.1380	0.0000	5.7834
Apartments Mid Rise	448.5	91.0415	5.3804	0.0000	225.5513
General Office Building	41.85	8.4952	0.5021	0.0000	21.0464
High Turnover (Sit Down Restaurant)	428.4	86.9613	5.1393	0.0000	215.4430
Hotel	27.38	5.5579	0.3285	0.0000	13.7694
Quality Restaurant	7.3	1.4818	0.0876	0.0000	3.6712
Regional Shopping Center	58.8	11.9359	0.7054	0.0000	29.5706
Total		**207.8079**	**12.2811**	**0.0000**	**514.8354**

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

Village South Specific Plan (Proposed)

Los Angeles-South Coast County, Summer

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
General Office Building	45.00	1000sqft	1.03	45,000.00	0
High Turnover (Sit Down Restaurant)	36.00	1000sqft	0.83	36,000.00	0
Hotel	50.00	Room	1.67	72,600.00	0
Quality Restaurant	8.00	1000sqft	0.18	8,000.00	0
Apartments Low Rise	25.00	Dwelling Unit	1.56	25,000.00	72
Apartments Mid Rise	975.00	Dwelling Unit	25.66	975,000.00	2789
Regional Shopping Center	56.00	1000sqft	1.29	56,000.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.2	**Precipitation Freq (Days)**	33
Climate Zone	9			**Operational Year**	2028
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	702.44	**CH4 Intensity (lb/MWhr)**	0.029	**N2O Intensity (lb/MWhr)**	0.006

1.3 User Entered Comments & Non-Default Data

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

Project Characteristics - Consistent with the DEIR's model.

Land Use - See SWAPE comment regarding residential and retail land uses.

Construction Phase - See SWAPE comment regarding individual construction phase lengths.

Demolition - Consistent with the DEIR's model. See SWAPE comment regarding demolition.

Vehicle Trips - Saturday trips consistent with the DEIR's model. See SWAPE comment regarding weekday and Sunday trips.

Woodstoves - Woodstoves and wood-burning fireplaces consistent with the DEIR's model. See SWAPE comment regarding gas fireplaces.

Energy Use -

Construction Off-road Equipment Mitigation - See SWAPE comment on construction-related mitigation.

Area Mitigation - See SWAPE comment regarding operational mitigation measures.

Water Mitigation - See SWAPE comment regarding operational mitigation measures.

Table Name	Column Name	Default Value	New Value
tblFireplaces	FireplaceWoodMass	1,019.20	0.00
tblFireplaces	FireplaceWoodMass	1,019.20	0.00
tblFireplaces	NumberWood	1.25	0.00
tblFireplaces	NumberWood	48.75	0.00
tblVehicleTrips	ST_TR	7.16	6.17
tblVehicleTrips	ST_TR	6.39	3.87
tblVehicleTrips	ST_TR	2.46	1.39
tblVehicleTrips	ST_TR	158.37	79.82
tblVehicleTrips	ST_TR	8.19	3.75
tblVehicleTrips	ST_TR	94.36	63.99
tblVehicleTrips	ST_TR	49.97	10.74
tblVehicleTrips	SU_TR	6.07	6.16
tblVehicleTrips	SU_TR	5.86	4.18
tblVehicleTrips	SU_TR	1.05	0.69
tblVehicleTrips	SU_TR	131.84	78.27

tblVehicleTrips	SU_TR	5.95	3.20
tblVehicleTrips	SU_TR	72.16	57.65
tblVehicleTrips	SU_TR	25.24	6.39
tblVehicleTrips	WD_TR	6.59	5.83
tblVehicleTrips	WD_TR	6.65	4.13
tblVehicleTrips	WD_TR	11.03	6.41
tblVehicleTrips	WD_TR	127.15	65.80
tblVehicleTrips	WD_TR	8.17	3.84
tblVehicleTrips	WD_TR	89.95	62.64
tblVehicleTrips	WD_TR	42.70	9.43
tblWoodstoves	NumberCatalytic	1.25	0.00
tblWoodstoves	NumberCatalytic	48.75	0.00
tblWoodstoves	NumberNoncatalytic	1.25	0.00
tblWoodstoves	NumberNoncatalytic	48.75	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00

2.0 Emissions Summary

2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2021	4.2769	46.4588	31.6840	0.0643	18.2675	2.0461	20.3135	9.9840	1.8824	11.8664	0.0000	6,234.7974	6,234.7974	1.9495	0.0000	6,283.5352
2022	5.3304	38.8967	49.5629	0.1517	9.8688	1.6366	10.7727	3.6558	1.5057	5.1615	0.0000	15,251.5674	15,251.5674	1.9503	0.0000	15,278.5288
2023	4.8957	26.3317	46.7567	0.1472	9.8688	0.7794	10.6482	2.6381	0.7322	3.3702	0.0000	14,807.5269	14,807.5269	1.0250	0.0000	14,833.1521
2024	237.1630	9.5575	15.1043	0.0244	1.7884	0.4698	1.8628	0.4743	0.4322	0.5476	0.0000	2,361.3989	2,361.3989	0.7177	0.0000	2,379.3421
Maximum	**237.1630**	**46.4588**	**49.5629**	**0.1517**	**18.2675**	**2.0461**	**20.3135**	**9.9840**	**1.8824**	**11.8664**	**0.0000**	**15,251.5674**	**15,251.5674**	**1.9503**	**0.0000**	**15,278.5288**

2.1 Overall Construction (Maximum Daily Emission)

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2021	4.2769	46.4588	31.6840	0.0643	18.2675	2.0461	20.3135	9.9840	1.8824	11.8664	0.0000	6,234.7974	6,234.7974	1.9495	0.0000	6,283.5352
2022	5.3304	38.8967	49.5629	0.1517	9.8688	1.6366	10.7727	3.6558	1.5057	5.1615	0.0000	15,251.5674	15,251.5674	1.9503	0.0000	15,278.5288
2023	4.8957	26.3317	46.7567	0.1472	9.8688	0.7794	10.6482	2.6381	0.7322	3.3702	0.0000	14,807.5269	14,807.5269	1.0250	0.0000	14,833.1520
2024	237.1630	9.5575	15.1043	0.0244	1.7884	0.4698	1.8628	0.4743	0.4322	0.5476	0.0000	2,361.3989	2,361.3989	0.7177	0.0000	2,379.3421
Maximum	**237.1630**	**46.4588**	**49.5629**	**0.1517**	**18.2675**	**2.0461**	**20.3135**	**9.9840**	**1.8824**	**11.8664**	**0.0000**	**15,251.5674**	**15,251.5674**	**1.9503**	**0.0000**	**15,278.5288**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192
Energy	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387
Mobile	9.8489	45.4304	114.8495	0.4917	45.9592	0.3360	46.2951	12.2950	0.3119	12.6070		50,306.6034	50,306.6034	2.1807		50,361.1208
Total	**41.1168**	**67.2262**	**207.5497**	**0.6278**	**45.9592**	**2.4626**	**48.4217**	**12.2950**	**2.4385**	**14.7336**	**0.0000**	**76,811.1816**	**76,811.1816**	**2.8282**	**0.4832**	**77,025.8786**

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192
Energy	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387
Mobile	9.8489	45.4304	114.8495	0.4917	45.9592	0.3360	46.2951	12.2950	0.3119	12.6070		50,306.6034	50,306.6034	2.1807		50,361.1208
Total	**41.1168**	**67.2262**	**207.5497**	**0.6278**	**45.9592**	**2.4626**	**48.4217**	**12.2950**	**2.4385**	**14.7336**	**0.0000**	**76,811.1816**	**76,811.1816**	**2.8282**	**0.4832**	**77,025.8786**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	9/1/2021	10/12/2021	5	30	
2	Site Preparation	Site Preparation	10/13/2021	11/9/2021	5	20	
3	Grading	Grading	11/10/2021	1/11/2022	5	45	
4	Building Construction	Building Construction	1/12/2022	12/12/2023	5	500	
5	Paving	Paving	12/13/2023	1/30/2024	5	35	
6	Architectural Coating	Architectural Coating	1/31/2024	3/19/2024	5	35	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 112.5

Acres of Paving: 0

Residential Indoor: 2,025,000; Residential Outdoor: 675,000; Non-Residential Indoor: 326,400; Non-Residential Outdoor: 108,800; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Demolition	Excavators	3	8.00	158	0.38
Demolition	Rubber Tired Dozers	2	8.00	247	0.40
Site Preparation	Rubber Tired Dozers	3	8.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	4	8.00	97	0.37
Grading	Excavators	2	8.00	158	0.38
Grading	Graders	1	8.00	187	0.41
Grading	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Scrapers	2	8.00	367	0.48
Grading	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Building Construction	Cranes	1	7.00	231	0.29
Building Construction	Forklifts	3	8.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	3	7.00	97	0.37
Building Construction	Welders	1	8.00	46	0.45
Paving	Pavers	2	8.00	130	0.42
Paving	Paving Equipment	2	8.00	132	0.36
Paving	Rollers	2	8.00	80	0.38
Architectural Coating	Air Compressors	1	6.00	78	0.48

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	6	15.00	0.00	458.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	7	18.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	8	20.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	801.00	143.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	160.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Demolition - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					3.3074	0.0000	3.3074	0.5008	0.0000	0.5008			0.0000			0.0000
Off-Road	3.1651	31.4407	21.5650	0.0388		1.5513	1.5513		1.4411	1.4411		3,747.9449	3,747.9449	1.0549		3,774.3174
Total	**3.1651**	**31.4407**	**21.5650**	**0.0388**	**3.3074**	**1.5513**	**4.8588**	**0.5008**	**1.4411**	**1.9419**		**3,747.9449**	**3,747.9449**	**1.0549**		**3,774.3174**

3.2 Demolition - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.1273	4.0952	0.9602	0.0119	0.2669	0.0126	0.2795	0.0732	0.0120	0.0852		1,292.2413	1,292.2413	0.0877		1,294.4337
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0643	0.0442	0.6042	1.7100e-003	0.1677	1.3500e-003	0.1690	0.0445	1.2500e-003	0.0457		170.8155	170.8155	5.0300e-003		170.9413
Total	**0.1916**	**4.1394**	**1.5644**	**0.0136**	**0.4346**	**0.0139**	**0.4485**	**0.1176**	**0.0133**	**0.1309**		**1,463.0568**	**1,463.0568**	**0.0927**		**1,465.3750**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					3.3074	0.0000	3.3074	0.5008	0.0000	0.5008			0.0000			0.0000
Off-Road	3.1651	31.4407	21.5650	0.0388		1.5513	1.5513		1.4411	1.4411	0.0000	3,747.9449	3,747.9449	1.0549		3,774.3174
Total	**3.1651**	**31.4407**	**21.5650**	**0.0388**	**3.3074**	**1.5513**	**4.8588**	**0.5008**	**1.4411**	**1.9419**	**0.0000**	**3,747.9449**	**3,747.9449**	**1.0549**		**3,774.3174**

3.2 Demolition - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.1273	4.0952	0.9602	0.0119	0.2669	0.0126	0.2795	0.0732	0.0120	0.0852		1,292.2413	1,292.2413	0.0877		1,294.4337
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0643	0.0442	0.6042	1.7100e-003	0.1677	1.3500e-003	0.1690	0.0445	1.2500e-003	0.0457		170.8155	170.8155	5.0300e-003		170.9413
Total	**0.1916**	**4.1394**	**1.5644**	**0.0136**	**0.4346**	**0.0139**	**0.4485**	**0.1176**	**0.0133**	**0.1309**		**1,463.0568**	**1,463.0568**	**0.0927**		**1,465.3750**

3.3 Site Preparation - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					18.0663	0.0000	18.0663	9.9307	0.0000	9.9307			0.0000			0.0000
Off-Road	3.8882	40.4971	21.1543	0.0380		2.0445	2.0445		1.8809	1.8809		3,685.6569	3,685.6569	1.1920		3,715.4573
Total	**3.8882**	**40.4971**	**21.1543**	**0.0380**	**18.0663**	**2.0445**	**20.1107**	**9.9307**	**1.8809**	**11.8116**		**3,685.6569**	**3,685.6569**	**1.1920**		**3,715.4573**

3.3 Site Preparation - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0772	0.0530	0.7250	2.0600e-003	0.2012	1.6300e-003	0.2028	0.0534	1.5000e-003	0.0549		204.9786	204.9786	6.0400e-003		205.1296
Total	**0.0772**	**0.0530**	**0.7250**	**2.0600e-003**	**0.2012**	**1.6300e-003**	**0.2028**	**0.0534**	**1.5000e-003**	**0.0549**		**204.9786**	**204.9786**	**6.0400e-003**		**205.1296**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					18.0663	0.0000	18.0663	9.9307	0.0000	9.9307			0.0000			0.0000
Off-Road	3.8882	40.4971	21.1543	0.0380		2.0445	2.0445		1.8809	1.8809	0.0000	3,685.6569	3,685.6569	1.1920		3,715.4573
Total	**3.8882**	**40.4971**	**21.1543**	**0.0380**	**18.0663**	**2.0445**	**20.1107**	**9.9307**	**1.8809**	**11.8116**	**0.0000**	**3,685.6569**	**3,685.6569**	**1.1920**		**3,715.4573**

3.3 Site Preparation - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0772	0.0530	0.7250	2.0600e-003	0.2012	1.6300e-003	0.2028	0.0534	1.5000e-003	0.0549		204.9786	204.9786	6.0400e-003		205.1296
Total	**0.0772**	**0.0530**	**0.7250**	**2.0600e-003**	**0.2012**	**1.6300e-003**	**0.2028**	**0.0534**	**1.5000e-003**	**0.0549**		**204.9786**	**204.9786**	**6.0400e-003**		**205.1296**

3.4 Grading - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	4.1912	46.3998	30.8785	0.0620		1.9853	1.9853		1.8265	1.8265		6,007.0434	6,007.0434	1.9428		6,055.6134
Total	**4.1912**	**46.3998**	**30.8785**	**0.0620**	**8.6733**	**1.9853**	**10.6587**	**3.5965**	**1.8265**	**5.4230**		**6,007.0434**	**6,007.0434**	**1.9428**		**6,055.6134**

3.4 Grading - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0857	0.0589	0.8056	2.2900e-003	0.2236	1.8100e-003	0.2254	0.0593	1.6600e-003	0.0610		227.7540	227.7540	6.7100e-003		227.9217
Total	**0.0857**	**0.0589**	**0.8056**	**2.2900e-003**	**0.2236**	**1.8100e-003**	**0.2254**	**0.0593**	**1.6600e-003**	**0.0610**		**227.7540**	**227.7540**	**6.7100e-003**		**227.9217**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	4.1912	46.3998	30.8785	0.0620		1.9853	1.9853		1.8265	1.8265	0.0000	6,007.0434	6,007.0434	1.9428		6,055.6134
Total	**4.1912**	**46.3998**	**30.8785**	**0.0620**	**8.6733**	**1.9853**	**10.6587**	**3.5965**	**1.8265**	**5.4230**	**0.0000**	**6,007.0434**	**6,007.0434**	**1.9428**		**6,055.6134**

3.4 Grading - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0857	0.0589	0.8056	2.2900e-003	0.2236	1.8100e-003	0.2254	0.0593	1.6600e-003	0.0610		227.7540	227.7540	6.7100e-003		227.9217
Total	**0.0857**	**0.0589**	**0.8056**	**2.2900e-003**	**0.2236**	**1.8100e-003**	**0.2254**	**0.0593**	**1.6600e-003**	**0.0610**		**227.7540**	**227.7540**	**6.7100e-003**		**227.9217**

3.4 Grading - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	3.6248	38.8435	29.0415	0.0621		1.6349	1.6349		1.5041	1.5041		6,011.4105	6,011.4105	1.9442		6,060.0158
Total	**3.6248**	**38.8435**	**29.0415**	**0.0621**	**8.6733**	**1.6349**	**10.3082**	**3.5965**	**1.5041**	**5.1006**		**6,011.4105**	**6,011.4105**	**1.9442**		**6,060.0158**

3.4 Grading - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0803	0.0532	0.7432	2.2100e-003	0.2236	1.7500e-003	0.2253	0.0593	1.6100e-003	0.0609		219.7425	219.7425	6.0600e-003		219.8941
Total	**0.0803**	**0.0532**	**0.7432**	**2.2100e-003**	**0.2236**	**1.7500e-003**	**0.2253**	**0.0593**	**1.6100e-003**	**0.0609**		**219.7425**	**219.7425**	**6.0600e-003**		**219.8941**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	3.6248	38.8435	29.0415	0.0621		1.6349	1.6349		1.5041	1.5041	0.0000	6,011.4105	6,011.4105	1.9442		6,060.0158
Total	**3.6248**	**38.8435**	**29.0415**	**0.0621**	**8.6733**	**1.6349**	**10.3082**	**3.5965**	**1.5041**	**5.1006**	**0.0000**	**6,011.4105**	**6,011.4105**	**1.9442**		**6,060.0158**

3.4 Grading - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0803	0.0532	0.7432	2.2100e-003	0.2236	1.7500e-003	0.2253	0.0593	1.6100e-003	0.0609		219.7425	219.7425	6.0600e-003		219.8941
Total	**0.0803**	**0.0532**	**0.7432**	**2.2100e-003**	**0.2236**	**1.7500e-003**	**0.2253**	**0.0593**	**1.6100e-003**	**0.0609**		**219.7425**	**219.7425**	**6.0600e-003**		**219.8941**

3.5 Building Construction - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.7062	15.6156	16.3634	0.0269		0.8090	0.8090		0.7612	0.7612		2,554.3336	2,554.3336	0.6120		2,569.6322
Total	**1.7062**	**15.6156**	**16.3634**	**0.0269**		**0.8090**	**0.8090**		**0.7612**	**0.7612**		**2,554.3336**	**2,554.3336**	**0.6120**		**2,569.6322**

3.5 Building Construction - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.4079	13.2032	3.4341	0.0364	0.9155	0.0248	0.9404	0.2636	0.0237	0.2873		3,896.5482	3,896.5482	0.2236		3,902.1384
Worker	3.2162	2.1318	29.7654	0.0883	8.9533	0.0701	9.0234	2.3745	0.0646	2.4390		8,800.6857	8,800.6857	0.2429		8,806.7582
Total	**3.6242**	**15.3350**	**33.1995**	**0.1247**	**9.8688**	**0.0949**	**9.9637**	**2.6381**	**0.0883**	**2.7263**		**12,697.2339**	**12,697.2339**	**0.4665**		**12,708.8966**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.7062	15.6156	16.3634	0.0269		0.8090	0.8090		0.7612	0.7612	0.0000	2,554.3336	2,554.3336	0.6120		2,569.6322
Total	**1.7062**	**15.6156**	**16.3634**	**0.0269**		**0.8090**	**0.8090**		**0.7612**	**0.7612**	**0.0000**	**2,554.3336**	**2,554.3336**	**0.6120**		**2,569.6322**

3.5 Building Construction - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.4079	13.2032	3.4341	0.0364	0.9155	0.0248	0.9404	0.2636	0.0237	0.2873		3,896.5482	3,896.5482	0.2236		3,902.1384
Worker	3.2162	2.1318	29.7654	0.0883	8.9533	0.0701	9.0234	2.3745	0.0646	2.4390		8,800.6857	8,800.6857	0.2429		8,806.7582
Total	**3.6242**	**15.3350**	**33.1995**	**0.1247**	**9.8688**	**0.0949**	**9.9637**	**2.6381**	**0.0883**	**2.7263**		**12,697.2339**	**12,697.2339**	**0.4665**		**12,708.8966**

3.5 Building Construction - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.5728	14.3849	16.2440	0.0269		0.6997	0.6997		0.6584	0.6584		2,555.2099	2,555.2099	0.6079		2,570.4061
Total	**1.5728**	**14.3849**	**16.2440**	**0.0269**		**0.6997**	**0.6997**		**0.6584**	**0.6584**		**2,555.2099**	**2,555.2099**	**0.6079**		**2,570.4061**

3.5 Building Construction - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.3027	10.0181	3.1014	0.0352	0.9156	0.0116	0.9271	0.2636	0.0111	0.2747		3,773.8762	3,773.8762	0.1982		3,778.8300
Worker	3.0203	1.9287	27.4113	0.0851	8.9533	0.0681	9.0214	2.3745	0.0627	2.4372		8,478.4408	8,478.4408	0.2190		8,483.9160
Total	**3.3229**	**11.9468**	**30.5127**	**0.1203**	**9.8688**	**0.0797**	**9.9485**	**2.6381**	**0.0738**	**2.7118**		**12,252.3170**	**12,252.3170**	**0.4172**		**12,262.7460**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.5728	14.3849	16.2440	0.0269		0.6997	0.6997		0.6584	0.6584	0.0000	2,555.2099	2,555.2099	0.6079		2,570.4061
Total	**1.5728**	**14.3849**	**16.2440**	**0.0269**		**0.6997**	**0.6997**		**0.6584**	**0.6584**	**0.0000**	**2,555.2099**	**2,555.2099**	**0.6079**		**2,570.4061**

3.5 Building Construction - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.3027	10.0181	3.1014	0.0352	0.9156	0.0116	0.9271	0.2636	0.0111	0.2747		3,773.8762	3,773.8762	0.1982		3,778.8300
Worker	3.0203	1.9287	27.4113	0.0851	8.9533	0.0681	9.0214	2.3745	0.0627	2.4372		8,478.4408	8,478.4408	0.2190		8,483.9160
Total	**3.3229**	**11.9468**	**30.5127**	**0.1203**	**9.8688**	**0.0797**	**9.9485**	**2.6381**	**0.0738**	**2.7118**		**12,252.3170**	**12,252.3170**	**0.4172**		**12,262.7460**

3.6 Paving - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.0327	10.1917	14.5842	0.0228		0.5102	0.5102		0.4694	0.4694		2,207.5841	2,207.5841	0.7140		2,225.4336
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**1.0327**	**10.1917**	**14.5842**	**0.0228**		**0.5102**	**0.5102**		**0.4694**	**0.4694**		**2,207.5841**	**2,207.5841**	**0.7140**		**2,225.4336**

3.6 Paving - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0566	0.0361	0.5133	1.5900e-003	0.1677	1.2800e-003	0.1689	0.0445	1.1700e-003	0.0456		158.7723	158.7723	4.1000e-003		158.8748
Total	**0.0566**	**0.0361**	**0.5133**	**1.5900e-003**	**0.1677**	**1.2800e-003**	**0.1689**	**0.0445**	**1.1700e-003**	**0.0456**		**158.7723**	**158.7723**	**4.1000e-003**		**158.8748**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.0327	10.1917	14.5842	0.0228		0.5102	0.5102		0.4694	0.4694	0.0000	2,207.5841	2,207.5841	0.7140		2,225.4336
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**1.0327**	**10.1917**	**14.5842**	**0.0228**		**0.5102**	**0.5102**		**0.4694**	**0.4694**	**0.0000**	**2,207.5841**	**2,207.5841**	**0.7140**		**2,225.4336**

3.6 Paving - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0566	0.0361	0.5133	1.5900e-003	0.1677	1.2800e-003	0.1689	0.0445	1.1700e-003	0.0456		158.7723	158.7723	4.1000e-003		158.8748
Total	**0.0566**	**0.0361**	**0.5133**	**1.5900e-003**	**0.1677**	**1.2800e-003**	**0.1689**	**0.0445**	**1.1700e-003**	**0.0456**		**158.7723**	**158.7723**	**4.1000e-003**		**158.8748**

3.6 Paving - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.9882	9.5246	14.6258	0.0228		0.4685	0.4685		0.4310	0.4310		2,207.5472	2,207.5472	0.7140		2,225.3963
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**0.9882**	**9.5246**	**14.6258**	**0.0228**		**0.4685**	**0.4685**		**0.4310**	**0.4310**		**2,207.5472**	**2,207.5472**	**0.7140**		**2,225.3963**

3.6 Paving - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0535	0.0329	0.4785	1.5400e-003	0.1677	1.2600e-003	0.1689	0.0445	1.1600e-003	0.0456		153.8517	153.8517	3.7600e-003		153.9458
Total	**0.0535**	**0.0329**	**0.4785**	**1.5400e-003**	**0.1677**	**1.2600e-003**	**0.1689**	**0.0445**	**1.1600e-003**	**0.0456**		**153.8517**	**153.8517**	**3.7600e-003**		**153.9458**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.9882	9.5246	14.6258	0.0228		0.4685	0.4685		0.4310	0.4310	0.0000	2,207.5472	2,207.5472	0.7140		2,225.3963
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**0.9882**	**9.5246**	**14.6258**	**0.0228**		**0.4685**	**0.4685**		**0.4310**	**0.4310**	**0.0000**	**2,207.5472**	**2,207.5472**	**0.7140**		**2,225.3963**

3.6 Paving - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0535	0.0329	0.4785	1.5400e-003	0.1677	1.2600e-003	0.1689	0.0445	1.1600e-003	0.0456		153.8517	153.8517	3.7600e-003		153.9458
Total	**0.0535**	**0.0329**	**0.4785**	**1.5400e-003**	**0.1677**	**1.2600e-003**	**0.1689**	**0.0445**	**1.1600e-003**	**0.0456**		**153.8517**	**153.8517**	**3.7600e-003**		**153.9458**

3.7 Architectural Coating - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	236.4115					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1808	1.2188	1.8101	2.9700e-003		0.0609	0.0609		0.0609	0.0609		281.4481	281.4481	0.0159		281.8443
Total	**236.5923**	**1.2188**	**1.8101**	**2.9700e-003**		**0.0609**	**0.0609**		**0.0609**	**0.0609**		**281.4481**	**281.4481**	**0.0159**		**281.8443**

3.7 Architectural Coating - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.5707	0.3513	5.1044	0.0165	1.7884	0.0134	1.8018	0.4743	0.0123	0.4866		1,641.0852	1,641.0852	0.0401		1,642.0886
Total	**0.5707**	**0.3513**	**5.1044**	**0.0165**	**1.7884**	**0.0134**	**1.8018**	**0.4743**	**0.0123**	**0.4866**		**1,641.0852**	**1,641.0852**	**0.0401**		**1,642.0886**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	236.4115					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1808	1.2188	1.8101	2.9700e-003		0.0609	0.0609		0.0609	0.0609	0.0000	281.4481	281.4481	0.0159		281.8443
Total	**236.5923**	**1.2188**	**1.8101**	**2.9700e-003**		**0.0609**	**0.0609**		**0.0609**	**0.0609**	**0.0000**	**281.4481**	**281.4481**	**0.0159**		**281.8443**

3.7 Architectural Coating - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.5707	0.3513	5.1044	0.0165	1.7884	0.0134	1.8018	0.4743	0.0123	0.4866		1,641.0852	1,641.0852	0.0401		1,642.0886
Total	**0.5707**	**0.3513**	**5.1044**	**0.0165**	**1.7884**	**0.0134**	**1.8018**	**0.4743**	**0.0123**	**0.4866**		**1,641.0852**	**1,641.0852**	**0.0401**		**1,642.0886**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	9.8489	45.4304	114.8495	0.4917	45.9592	0.3360	46.2951	12.2950	0.3119	12.6070		50,306.6034	50,306.6034	2.1807		50,361.1208
Unmitigated	9.8489	45.4304	114.8495	0.4917	45.9592	0.3360	46.2951	12.2950	0.3119	12.6070		50,306.6034	50,306.6034	2.1807		50,361.1208

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Apartments Low Rise	145.75	154.25	154.00	506,227	506,227
Apartments Mid Rise	4,026.75	3,773.25	4075.50	13,660,065	13,660,065
General Office Building	288.45	62.55	31.05	706,812	706,812
High Turnover (Sit Down Restaurant)	2,368.80	2,873.52	2817.72	3,413,937	3,413,937
Hotel	192.00	187.50	160.00	445,703	445,703
Quality Restaurant	501.12	511.92	461.20	707,488	707,488
Regional Shopping Center	528.08	601.44	357.84	1,112,221	1,112,221
Total	8,050.95	8,164.43	8,057.31	20,552,452	20,552,452

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Apartments Low Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3
Apartments Mid Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3
General Office Building	16.60	8.40	6.90	33.00	48.00	19.00	77	19	4
High Turnover (Sit Down	16.60	8.40	6.90	8.50	72.50	19.00	37	20	43
Hotel	16.60	8.40	6.90	19.40	61.60	19.00	58	38	4
Quality Restaurant	16.60	8.40	6.90	12.00	69.00	19.00	38	18	44
Regional Shopping Center	16.60	8.40	6.90	16.30	64.70	19.00	54	35	11

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Apartments Low Rise	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Apartments Mid Rise	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
General Office Building	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
High Turnover (Sit Down Restaurant)	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Hotel	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Quality Restaurant	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Regional Shopping Center	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387
NaturalGas Unmitigated	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Apartments Low Rise	1119.16	0.0121	0.1031	0.0439	6.6000e-004		8.3400e-003	8.3400e-003		8.3400e-003	8.3400e-003		131.6662	131.6662	2.5200e-003	2.4100e-003	132.4486
Apartments Mid Rise	35784.3	0.3859	3.2978	1.4033	0.0211		0.2666	0.2666		0.2666	0.2666		4,209.9164	4,209.9164	0.0807	0.0772	4,234.9339
General Office Building	1283.42	0.0138	0.1258	0.1057	7.5000e-004		9.5600e-003	9.5600e-003		9.5600e-003	9.5600e-003		150.9911	150.9911	2.8900e-003	2.7700e-003	151.8884
High Turnover (Sit Down Restaurant)	22759.9	0.2455	2.2314	1.8743	0.0134		0.1696	0.1696		0.1696	0.1696		2,677.6342	2,677.6342	0.0513	0.0491	2,693.5460
Hotel	4769.72	0.0514	0.4676	0.3928	2.8100e-003		0.0355	0.0355		0.0355	0.0355		561.1436	561.1436	0.0108	0.0103	564.4782
Quality Restaurant	5057.75	0.0545	0.4959	0.4165	2.9800e-003		0.0377	0.0377		0.0377	0.0377		595.0298	595.0298	0.0114	0.0109	598.5658
Regional Shopping Center	251.616	2.7100e-003	0.0247	0.0207	1.5000e-004		1.8700e-003	1.8700e-003		1.8700e-003	1.8700e-003		29.6019	29.6019	5.7000e-004	5.4000e-004	29.7778
Total		**0.7660**	**6.7463**	**4.2573**	**0.0418**		**0.5292**	**0.5292**		**0.5292**	**0.5292**		**8,355.9832**	**8,355.9832**	**0.1602**	**0.1532**	**8,405.6387**

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Apartments Low Rise	1.11916	0.0121	0.1031	0.0439	6.6000e-004		8.3400e-003	8.3400e-003		8.3400e-003	8.3400e-003		131.6662	131.6662	2.5200e-003	2.4100e-003	132.4486
Apartments Mid Rise	35.7843	0.3859	3.2978	1.4033	0.0211		0.2666	0.2666		0.2666	0.2666		4,209.9164	4,209.9164	0.0807	0.0772	4,234.9339
General Office Building	1.28342	0.0138	0.1258	0.1057	7.5000e-004		9.5600e-003	9.5600e-003		9.5600e-003	9.5600e-003		150.9911	150.9911	2.8900e-003	2.7700e-003	151.8884
High Turnover (Sit Down Restaurant)	22.7599	0.2455	2.2314	1.8743	0.0134		0.1696	0.1696		0.1696	0.1696		2,677.6342	2,677.6342	0.0513	0.0491	2,693.5460
Hotel	4.76972	0.0514	0.4676	0.3928	2.8100e-003		0.0355	0.0355		0.0355	0.0355		561.1436	561.1436	0.0108	0.0103	564.4782
Quality Restaurant	5.05775	0.0545	0.4959	0.4165	2.9800e-003		0.0377	0.0377		0.0377	0.0377		595.0298	595.0298	0.0114	0.0109	598.5658
Regional Shopping Center	0.251616	2.7100e-003	0.0247	0.0207	1.5000e-004		1.8700e-003	1.8700e-003		1.8700e-003	1.8700e-003		29.6019	29.6019	5.7000e-004	5.4000e-004	29.7778
Total		**0.7660**	**6.7463**	**4.2573**	**0.0418**		**0.5292**	**0.5292**		**0.5292**	**0.5292**		**8,355.9832**	**8,355.9832**	**0.1602**	**0.1532**	**8,405.6387**

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192
Unmitigated	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	2.2670					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	24.1085					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	1.6500	14.1000	6.0000	0.0900		1.1400	1.1400		1.1400	1.1400	0.0000	18,000.0000	18,000.0000	0.3450	0.3300	18,106.9650
Landscaping	2.4766	0.9496	82.4430	4.3600e-003		0.4574	0.4574		0.4574	0.4574		148.5950	148.5950	0.1424		152.1542
Total	**30.5020**	**15.0496**	**88.4430**	**0.0944**		**1.5974**	**1.5974**		**1.5974**	**1.5974**	**0.0000**	**18,148.5950**	**18,148.5950**	**0.4874**	**0.3300**	**18,259.1192**

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	2.2670					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	24.1085					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	1.6500	14.1000	6.0000	0.0900		1.1400	1.1400		1.1400	1.1400	0.0000	18,000.0000	18,000.0000	0.3450	0.3300	18,106.9650
Landscaping	2.4766	0.9496	82.4430	4.3600e-003		0.4574	0.4574		0.4574	0.4574		148.5950	148.5950	0.1424		152.1542
Total	**30.5020**	**15.0496**	**88.4430**	**0.0944**		**1.5974**	**1.5974**		**1.5974**	**1.5974**	**0.0000**	**18,148.5950**	**18,148.5950**	**0.4874**	**0.3300**	**18,259.1192**

7.0 Water Detail

7.1 Mitigation Measures Water

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

Village South Specific Plan (Proposed)

Los Angeles-South Coast County, Winter

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
General Office Building	45.00	1000sqft	1.03	45,000.00	0
High Turnover (Sit Down Restaurant)	36.00	1000sqft	0.83	36,000.00	0
Hotel	50.00	Room	1.67	72,600.00	0
Quality Restaurant	8.00	1000sqft	0.18	8,000.00	0
Apartments Low Rise	25.00	Dwelling Unit	1.56	25,000.00	72
Apartments Mid Rise	975.00	Dwelling Unit	25.66	975,000.00	2789
Regional Shopping Center	56.00	1000sqft	1.29	56,000.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.2	**Precipitation Freq (Days)**	33
Climate Zone	9			**Operational Year**	2028
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	702.44	**CH4 Intensity (lb/MWhr)**	0.029	**N2O Intensity (lb/MWhr)**	0.006

1.3 User Entered Comments & Non-Default Data

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

Project Characteristics - Consistent with the DEIR's model.

Land Use - See SWAPE comment regarding residential and retail land uses.

Construction Phase - See SWAPE comment regarding individual construction phase lengths.

Demolition - Consistent with the DEIR's model. See SWAPE comment regarding demolition.

Vehicle Trips - Saturday trips consistent with the DEIR's model. See SWAPE comment regarding weekday and Sunday trips.

Woodstoves - Woodstoves and wood-burning fireplaces consistent with the DEIR's model. See SWAPE comment regarding gas fireplaces.

Energy Use -

Construction Off-road Equipment Mitigation - See SWAPE comment on construction-related mitigation.

Area Mitigation - See SWAPE comment regarding operational mitigation measures.

Water Mitigation - See SWAPE comment regarding operational mitigation measures.

Table Name	Column Name	Default Value	New Value
tblFireplaces	FireplaceWoodMass	1,019.20	0.00
tblFireplaces	FireplaceWoodMass	1,019.20	0.00
tblFireplaces	NumberWood	1.25	0.00
tblFireplaces	NumberWood	48.75	0.00
tblVehicleTrips	ST_TR	7.16	6.17
tblVehicleTrips	ST_TR	6.39	3.87
tblVehicleTrips	ST_TR	2.46	1.39
tblVehicleTrips	ST_TR	158.37	79.82
tblVehicleTrips	ST_TR	8.19	3.75
tblVehicleTrips	ST_TR	94.36	63.99
tblVehicleTrips	ST_TR	49.97	10.74
tblVehicleTrips	SU_TR	6.07	6.16
tblVehicleTrips	SU_TR	5.86	4.18
tblVehicleTrips	SU_TR	1.05	0.69
tblVehicleTrips	SU_TR	131.84	78.27

tblVehicleTrips	SU_TR	5.95	3.20
tblVehicleTrips	SU_TR	72.16	57.65
tblVehicleTrips	SU_TR	25.24	6.39
tblVehicleTrips	WD_TR	6.59	5.83
tblVehicleTrips	WD_TR	6.65	4.13
tblVehicleTrips	WD_TR	11.03	6.41
tblVehicleTrips	WD_TR	127.15	65.80
tblVehicleTrips	WD_TR	8.17	3.84
tblVehicleTrips	WD_TR	89.95	62.64
tblVehicleTrips	WD_TR	42.70	9.43
tblWoodstoves	NumberCatalytic	1.25	0.00
tblWoodstoves	NumberCatalytic	48.75	0.00
tblWoodstoves	NumberNoncatalytic	1.25	0.00
tblWoodstoves	NumberNoncatalytic	48.75	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00

2.0 Emissions Summary

2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2021	4.2865	46.4651	31.6150	0.0642	18.2675	2.0461	20.3135	9.9840	1.8824	11.8664	0.0000	6,221.4937	6,221.4937	1.9491	0.0000	6,270.2214
2022	5.7218	38.9024	47.3319	0.1455	9.8688	1.6366	10.7736	3.6558	1.5057	5.1615	0.0000	14,630.3099	14,630.3099	1.9499	0.0000	14,657.2663
2023	5.2705	26.4914	44.5936	0.1413	9.8688	0.7800	10.6488	2.6381	0.7328	3.3708	0.0000	14,210.3424	14,210.3424	1.0230	0.0000	14,235.9160
2024	237.2328	9.5610	15.0611	0.0243	1.7884	0.4698	1.8628	0.4743	0.4322	0.5476	0.0000	2,352.4178	2,352.4178	0.7175	0.0000	2,370.3550
Maximum	**237.2328**	**46.4651**	**47.3319**	**0.1455**	**18.2675**	**2.0461**	**20.3135**	**9.9840**	**1.8824**	**11.8664**	**0.0000**	**14,630.3099**	**14,630.3099**	**1.9499**	**0.0000**	**14,657.2663**

2.1 Overall Construction (Maximum Daily Emission)

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2021	4.2865	46.4651	31.6150	0.0642	18.2675	2.0461	20.3135	9.9840	1.8824	11.8664	0.0000	6,221.4937	6,221.4937	1.9491	0.0000	6,270.2214
2022	5.7218	38.9024	47.3319	0.1455	9.8688	1.6366	10.7736	3.6558	1.5057	5.1615	0.0000	14,630.3099	14,630.3099	1.9499	0.0000	14,657.2663
2023	5.2705	26.4914	44.5936	0.1413	9.8688	0.7800	10.6488	2.6381	0.7328	3.3708	0.0000	14,210.3424	14,210.3424	1.0230	0.0000	14,235.9160
2024	237.2328	9.5610	15.0611	0.0243	1.7884	0.4698	1.8628	0.4743	0.4322	0.5476	0.0000	2,352.4178	2,352.4178	0.7175	0.0000	2,370.3550
Maximum	**237.2328**	**46.4651**	**47.3319**	**0.1455**	**18.2675**	**2.0461**	**20.3135**	**9.9840**	**1.8824**	**11.8664**	**0.0000**	**14,630.3099**	**14,630.3099**	**1.9499**	**0.0000**	**14,657.2663**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192
Energy	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387
Mobile	9.5233	45.9914	110.0422	0.4681	45.9592	0.3373	46.2965	12.2950	0.3132	12.6083		47,917.8005	47,917.8005	2.1953		47,972.6839
Total	**40.7912**	**67.7872**	**202.7424**	**0.6043**	**45.9592**	**2.4640**	**48.4231**	**12.2950**	**2.4399**	**14.7349**	**0.0000**	**74,422.3787**	**74,422.3787**	**2.8429**	**0.4832**	**74,637.4417**

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192
Energy	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387
Mobile	9.5233	45.9914	110.0422	0.4681	45.9592	0.3373	46.2965	12.2950	0.3132	12.6083		47,917.8005	47,917.8005	2.1953		47,972.6839
Total	**40.7912**	**67.7872**	**202.7424**	**0.6043**	**45.9592**	**2.4640**	**48.4231**	**12.2950**	**2.4399**	**14.7349**	**0.0000**	**74,422.3787**	**74,422.3787**	**2.8429**	**0.4832**	**74,637.4417**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	9/1/2021	10/12/2021	5	30	
2	Site Preparation	Site Preparation	10/13/2021	11/9/2021	5	20	
3	Grading	Grading	11/10/2021	1/11/2022	5	45	
4	Building Construction	Building Construction	1/12/2022	12/12/2023	5	500	
5	Paving	Paving	12/13/2023	1/30/2024	5	35	
6	Architectural Coating	Architectural Coating	1/31/2024	3/19/2024	5	35	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 112.5

Acres of Paving: 0

Residential Indoor: 2,025,000; Residential Outdoor: 675,000; Non-Residential Indoor: 326,400; Non-Residential Outdoor: 108,800; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Demolition	Excavators	3	8.00	158	0.38
Demolition	Rubber Tired Dozers	2	8.00	247	0.40
Site Preparation	Rubber Tired Dozers	3	8.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	4	8.00	97	0.37
Grading	Excavators	2	8.00	158	0.38
Grading	Graders	1	8.00	187	0.41
Grading	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Scrapers	2	8.00	367	0.48
Grading	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Building Construction	Cranes	1	7.00	231	0.29
Building Construction	Forklifts	3	8.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	3	7.00	97	0.37
Building Construction	Welders	1	8.00	46	0.45
Paving	Pavers	2	8.00	130	0.42
Paving	Paving Equipment	2	8.00	132	0.36
Paving	Rollers	2	8.00	80	0.38
Architectural Coating	Air Compressors	1	6.00	78	0.48

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	6	15.00	0.00	458.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	7	18.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	8	20.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	801.00	143.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	160.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Demolition - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					3.3074	0.0000	3.3074	0.5008	0.0000	0.5008			0.0000			0.0000
Off-Road	3.1651	31.4407	21.5650	0.0388		1.5513	1.5513		1.4411	1.4411		3,747.9449	3,747.9449	1.0549		3,774.3174
Total	**3.1651**	**31.4407**	**21.5650**	**0.0388**	**3.3074**	**1.5513**	**4.8588**	**0.5008**	**1.4411**	**1.9419**		**3,747.9449**	**3,747.9449**	**1.0549**		**3,774.3174**

3.2 Demolition - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.1304	4.1454	1.0182	0.0117	0.2669	0.0128	0.2797	0.0732	0.0122	0.0854		1,269.8555	1,269.8555	0.0908		1,272.1252
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0715	0.0489	0.5524	1.6100e-003	0.1677	1.3500e-003	0.1690	0.0445	1.2500e-003	0.0457		160.8377	160.8377	4.7300e-003		160.9560
Total	**0.2019**	**4.1943**	**1.5706**	**0.0133**	**0.4346**	**0.0141**	**0.4487**	**0.1176**	**0.0135**	**0.1311**		**1,430.6932**	**1,430.6932**	**0.0955**		**1,433.0812**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					3.3074	0.0000	3.3074	0.5008	0.0000	0.5008			0.0000			0.0000
Off-Road	3.1651	31.4407	21.5650	0.0388		1.5513	1.5513		1.4411	1.4411	0.0000	3,747.9449	3,747.9449	1.0549		3,774.3174
Total	**3.1651**	**31.4407**	**21.5650**	**0.0388**	**3.3074**	**1.5513**	**4.8588**	**0.5008**	**1.4411**	**1.9419**	**0.0000**	**3,747.9449**	**3,747.9449**	**1.0549**		**3,774.3174**

3.2 Demolition - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.1304	4.1454	1.0182	0.0117	0.2669	0.0128	0.2797	0.0732	0.0122	0.0854		1,269.8555	1,269.8555	0.0908		1,272.1252
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0715	0.0489	0.5524	1.6100e-003	0.1677	1.3500e-003	0.1690	0.0445	1.2500e-003	0.0457		160.8377	160.8377	4.7300e-003		160.9560
Total	**0.2019**	**4.1943**	**1.5706**	**0.0133**	**0.4346**	**0.0141**	**0.4487**	**0.1176**	**0.0135**	**0.1311**		**1,430.6932**	**1,430.6932**	**0.0955**		**1,433.0812**

3.3 Site Preparation - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					18.0663	0.0000	18.0663	9.9307	0.0000	9.9307			0.0000			0.0000
Off-Road	3.8882	40.4971	21.1543	0.0380		2.0445	2.0445		1.8809	1.8809		3,685.6569	3,685.6569	1.1920		3,715.4573
Total	**3.8882**	**40.4971**	**21.1543**	**0.0380**	**18.0663**	**2.0445**	**20.1107**	**9.9307**	**1.8809**	**11.8116**		**3,685.6569**	**3,685.6569**	**1.1920**		**3,715.4573**

3.3 Site Preparation - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0858	0.0587	0.6629	1.9400e-003	0.2012	1.6300e-003	0.2028	0.0534	1.5000e-003	0.0549		193.0052	193.0052	5.6800e-003		193.1472
Total	**0.0858**	**0.0587**	**0.6629**	**1.9400e-003**	**0.2012**	**1.6300e-003**	**0.2028**	**0.0534**	**1.5000e-003**	**0.0549**		**193.0052**	**193.0052**	**5.6800e-003**		**193.1472**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					18.0663	0.0000	18.0663	9.9307	0.0000	9.9307			0.0000			0.0000
Off-Road	3.8882	40.4971	21.1543	0.0380		2.0445	2.0445		1.8809	1.8809	0.0000	3,685.6569	3,685.6569	1.1920		3,715.4573
Total	**3.8882**	**40.4971**	**21.1543**	**0.0380**	**18.0663**	**2.0445**	**20.1107**	**9.9307**	**1.8809**	**11.8116**	**0.0000**	**3,685.6569**	**3,685.6569**	**1.1920**		**3,715.4573**

3.3 Site Preparation - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0858	0.0587	0.6629	1.9400e-003	0.2012	1.6300e-003	0.2028	0.0534	1.5000e-003	0.0549		193.0052	193.0052	5.6800e-003		193.1472
Total	**0.0858**	**0.0587**	**0.6629**	**1.9400e-003**	**0.2012**	**1.6300e-003**	**0.2028**	**0.0534**	**1.5000e-003**	**0.0549**		**193.0052**	**193.0052**	**5.6800e-003**		**193.1472**

3.4 Grading - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	4.1912	46.3998	30.8785	0.0620		1.9853	1.9853		1.8265	1.8265		6,007.0434	6,007.0434	1.9428		6,055.6134
Total	**4.1912**	**46.3998**	**30.8785**	**0.0620**	**8.6733**	**1.9853**	**10.6587**	**3.5965**	**1.8265**	**5.4230**		**6,007.0434**	**6,007.0434**	**1.9428**		**6,055.6134**

3.4 Grading - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0954	0.0652	0.7365	2.1500e-003	0.2236	1.8100e-003	0.2254	0.0593	1.6600e-003	0.0610		214.4502	214.4502	6.3100e-003		214.6080
Total	**0.0954**	**0.0652**	**0.7365**	**2.1500e-003**	**0.2236**	**1.8100e-003**	**0.2254**	**0.0593**	**1.6600e-003**	**0.0610**		**214.4502**	**214.4502**	**6.3100e-003**		**214.6080**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	4.1912	46.3998	30.8785	0.0620		1.9853	1.9853		1.8265	1.8265	0.0000	6,007.0434	6,007.0434	1.9428		6,055.6134
Total	**4.1912**	**46.3998**	**30.8785**	**0.0620**	**8.6733**	**1.9853**	**10.6587**	**3.5965**	**1.8265**	**5.4230**	**0.0000**	**6,007.0434**	**6,007.0434**	**1.9428**		**6,055.6134**

3.4 Grading - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0954	0.0652	0.7365	2.1500e-003	0.2236	1.8100e-003	0.2254	0.0593	1.6600e-003	0.0610		214.4502	214.4502	6.3100e-003		214.6080
Total	**0.0954**	**0.0652**	**0.7365**	**2.1500e-003**	**0.2236**	**1.8100e-003**	**0.2254**	**0.0593**	**1.6600e-003**	**0.0610**		**214.4502**	**214.4502**	**6.3100e-003**		**214.6080**

3.4 Grading - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	3.6248	38.8435	29.0415	0.0621		1.6349	1.6349		1.5041	1.5041		6,011.4105	6,011.4105	1.9442		6,060.0158
Total	**3.6248**	**38.8435**	**29.0415**	**0.0621**	**8.6733**	**1.6349**	**10.3082**	**3.5965**	**1.5041**	**5.1006**		**6,011.4105**	**6,011.4105**	**1.9442**		**6,060.0158**

3.4 Grading - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0896	0.0589	0.6784	2.0800e-003	0.2236	1.7500e-003	0.2253	0.0593	1.6100e-003	0.0609		206.9139	206.9139	5.7000e-003		207.0563
Total	**0.0896**	**0.0589**	**0.6784**	**2.0800e-003**	**0.2236**	**1.7500e-003**	**0.2253**	**0.0593**	**1.6100e-003**	**0.0609**		**206.9139**	**206.9139**	**5.7000e-003**		**207.0563**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	3.6248	38.8435	29.0415	0.0621		1.6349	1.6349		1.5041	1.5041	0.0000	6,011.4105	6,011.4105	1.9442		6,060.0158
Total	**3.6248**	**38.8435**	**29.0415**	**0.0621**	**8.6733**	**1.6349**	**10.3082**	**3.5965**	**1.5041**	**5.1006**	**0.0000**	**6,011.4105**	**6,011.4105**	**1.9442**		**6,060.0158**

3.4 Grading - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0896	0.0589	0.6784	2.0800e-003	0.2236	1.7500e-003	0.2253	0.0593	1.6100e-003	0.0609		206.9139	206.9139	5.7000e-003		207.0563
Total	**0.0896**	**0.0589**	**0.6784**	**2.0800e-003**	**0.2236**	**1.7500e-003**	**0.2253**	**0.0593**	**1.6100e-003**	**0.0609**		**206.9139**	**206.9139**	**5.7000e-003**		**207.0563**

3.5 Building Construction - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.7062	15.6156	16.3634	0.0269		0.8090	0.8090		0.7612	0.7612		2,554.3336	2,554.3336	0.6120		2,569.6322
Total	**1.7062**	**15.6156**	**16.3634**	**0.0269**		**0.8090**	**0.8090**		**0.7612**	**0.7612**		**2,554.3336**	**2,554.3336**	**0.6120**		**2,569.6322**

3.5 Building Construction - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.4284	13.1673	3.8005	0.0354	0.9155	0.0256	0.9412	0.2636	0.0245	0.2881		3,789.0750	3,789.0750	0.2381		3,795.0283
Worker	3.5872	2.3593	27.1680	0.0832	8.9533	0.0701	9.0234	2.3745	0.0646	2.4390		8,286.9013	8,286.9013	0.2282		8,292.6058
Total	**4.0156**	**15.5266**	**30.9685**	**0.1186**	**9.8688**	**0.0957**	**9.9645**	**2.6381**	**0.0891**	**2.7271**		**12,075.9763**	**12,075.9763**	**0.4663**		**12,087.6341**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.7062	15.6156	16.3634	0.0269		0.8090	0.8090		0.7612	0.7612	0.0000	2,554.3336	2,554.3336	0.6120		2,569.6322
Total	**1.7062**	**15.6156**	**16.3634**	**0.0269**		**0.8090**	**0.8090**		**0.7612**	**0.7612**	**0.0000**	**2,554.3336**	**2,554.3336**	**0.6120**		**2,569.6322**

3.5 Building Construction - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.4284	13.1673	3.8005	0.0354	0.9155	0.0256	0.9412	0.2636	0.0245	0.2881		3,789.0750	3,789.0750	0.2381		3,795.0283
Worker	3.5872	2.3593	27.1680	0.0832	8.9533	0.0701	9.0234	2.3745	0.0646	2.4390		8,286.9013	8,286.9013	0.2282		8,292.6058
Total	**4.0156**	**15.5266**	**30.9685**	**0.1186**	**9.8688**	**0.0957**	**9.9645**	**2.6381**	**0.0891**	**2.7271**		**12,075.9763**	**12,075.9763**	**0.4663**		**12,087.6341**

3.5 Building Construction - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.5728	14.3849	16.2440	0.0269		0.6997	0.6997		0.6584	0.6584		2,555.2099	2,555.2099	0.6079		2,570.4061
Total	**1.5728**	**14.3849**	**16.2440**	**0.0269**		**0.6997**	**0.6997**		**0.6584**	**0.6584**		**2,555.2099**	**2,555.2099**	**0.6079**		**2,570.4061**

3.5 Building Construction - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.3183	9.9726	3.3771	0.0343	0.9156	0.0122	0.9277	0.2636	0.0116	0.2752		3,671.4007	3,671.4007	0.2096		3,676.6417
Worker	3.3795	2.1338	24.9725	0.0801	8.9533	0.0681	9.0214	2.3745	0.0627	2.4372		7,983.7318	7,983.7318	0.2055		7,988.8683
Total	**3.6978**	**12.1065**	**28.3496**	**0.1144**	**9.8688**	**0.0803**	**9.9491**	**2.6381**	**0.0743**	**2.7124**		**11,655.1325**	**11,655.1325**	**0.4151**		**11,665.5099**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.5728	14.3849	16.2440	0.0269		0.6997	0.6997		0.6584	0.6584	0.0000	2,555.2099	2,555.2099	0.6079		2,570.4061
Total	**1.5728**	**14.3849**	**16.2440**	**0.0269**		**0.6997**	**0.6997**		**0.6584**	**0.6584**	**0.0000**	**2,555.2099**	**2,555.2099**	**0.6079**		**2,570.4061**

3.5 Building Construction - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.3183	9.9726	3.3771	0.0343	0.9156	0.0122	0.9277	0.2636	0.0116	0.2752		3,671.4007	3,671.4007	0.2096		3,676.6417
Worker	3.3795	2.1338	24.9725	0.0801	8.9533	0.0681	9.0214	2.3745	0.0627	2.4372		7,983.7318	7,983.7318	0.2055		7,988.8683
Total	**3.6978**	**12.1065**	**28.3496**	**0.1144**	**9.8688**	**0.0803**	**9.9491**	**2.6381**	**0.0743**	**2.7124**		**11,655.1325**	**11,655.1325**	**0.4151**		**11,665.5099**

3.6 Paving - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.0327	10.1917	14.5842	0.0228		0.5102	0.5102		0.4694	0.4694		2,207.5841	2,207.5841	0.7140		2,225.4336
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**1.0327**	**10.1917**	**14.5842**	**0.0228**		**0.5102**	**0.5102**		**0.4694**	**0.4694**		**2,207.5841**	**2,207.5841**	**0.7140**		**2,225.4336**

3.6 Paving - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0633	0.0400	0.4677	1.5000e-003	0.1677	1.2800e-003	0.1689	0.0445	1.1700e-003	0.0456		149.5081	149.5081	3.8500e-003		149.6043
Total	**0.0633**	**0.0400**	**0.4677**	**1.5000e-003**	**0.1677**	**1.2800e-003**	**0.1689**	**0.0445**	**1.1700e-003**	**0.0456**		**149.5081**	**149.5081**	**3.8500e-003**		**149.6043**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.0327	10.1917	14.5842	0.0228		0.5102	0.5102		0.4694	0.4694	0.0000	2,207.5841	2,207.5841	0.7140		2,225.4336
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**1.0327**	**10.1917**	**14.5842**	**0.0228**		**0.5102**	**0.5102**		**0.4694**	**0.4694**	**0.0000**	**2,207.5841**	**2,207.5841**	**0.7140**		**2,225.4336**

3.6 Paving - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0633	0.0400	0.4677	1.5000e-003	0.1677	1.2800e-003	0.1689	0.0445	1.1700e-003	0.0456		149.5081	149.5081	3.8500e-003		149.6043
Total	**0.0633**	**0.0400**	**0.4677**	**1.5000e-003**	**0.1677**	**1.2800e-003**	**0.1689**	**0.0445**	**1.1700e-003**	**0.0456**		**149.5081**	**149.5081**	**3.8500e-003**		**149.6043**

3.6 Paving - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.9882	9.5246	14.6258	0.0228		0.4685	0.4685		0.4310	0.4310		2,207.5472	2,207.5472	0.7140		2,225.3963
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**0.9882**	**9.5246**	**14.6258**	**0.0228**		**0.4685**	**0.4685**		**0.4310**	**0.4310**		**2,207.5472**	**2,207.5472**	**0.7140**		**2,225.3963**

3.6 Paving - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0601	0.0364	0.4354	1.4500e-003	0.1677	1.2600e-003	0.1689	0.0445	1.1600e-003	0.0456		144.8706	144.8706	3.5300e-003		144.9587
Total	**0.0601**	**0.0364**	**0.4354**	**1.4500e-003**	**0.1677**	**1.2600e-003**	**0.1689**	**0.0445**	**1.1600e-003**	**0.0456**		**144.8706**	**144.8706**	**3.5300e-003**		**144.9587**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.9882	9.5246	14.6258	0.0228		0.4685	0.4685		0.4310	0.4310	0.0000	2,207.5472	2,207.5472	0.7140		2,225.3963
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**0.9882**	**9.5246**	**14.6258**	**0.0228**		**0.4685**	**0.4685**		**0.4310**	**0.4310**	**0.0000**	**2,207.5472**	**2,207.5472**	**0.7140**		**2,225.3963**

3.6 Paving - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0601	0.0364	0.4354	1.4500e-003	0.1677	1.2600e-003	0.1689	0.0445	1.1600e-003	0.0456		144.8706	144.8706	3.5300e-003		144.9587
Total	**0.0601**	**0.0364**	**0.4354**	**1.4500e-003**	**0.1677**	**1.2600e-003**	**0.1689**	**0.0445**	**1.1600e-003**	**0.0456**		**144.8706**	**144.8706**	**3.5300e-003**		**144.9587**

3.7 Architectural Coating - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	236.4115					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1808	1.2188	1.8101	2.9700e-003		0.0609	0.0609		0.0609	0.0609		281.4481	281.4481	0.0159		281.8443
Total	**236.5923**	**1.2188**	**1.8101**	**2.9700e-003**		**0.0609**	**0.0609**		**0.0609**	**0.0609**		**281.4481**	**281.4481**	**0.0159**		**281.8443**

3.7 Architectural Coating - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.6406	0.3886	4.6439	0.0155	1.7884	0.0134	1.8018	0.4743	0.0123	0.4866		1,545.2860	1,545.2860	0.0376		1,546.2262
Total	**0.6406**	**0.3886**	**4.6439**	**0.0155**	**1.7884**	**0.0134**	**1.8018**	**0.4743**	**0.0123**	**0.4866**		**1,545.2860**	**1,545.2860**	**0.0376**		**1,546.2262**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	236.4115					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1808	1.2188	1.8101	2.9700e-003		0.0609	0.0609		0.0609	0.0609	0.0000	281.4481	281.4481	0.0159		281.8443
Total	**236.5923**	**1.2188**	**1.8101**	**2.9700e-003**		**0.0609**	**0.0609**		**0.0609**	**0.0609**	**0.0000**	**281.4481**	**281.4481**	**0.0159**		**281.8443**

3.7 Architectural Coating - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.6406	0.3886	4.6439	0.0155	1.7884	0.0134	1.8018	0.4743	0.0123	0.4866		1,545.2860	1,545.2860	0.0376		1,546.2262
Total	**0.6406**	**0.3886**	**4.6439**	**0.0155**	**1.7884**	**0.0134**	**1.8018**	**0.4743**	**0.0123**	**0.4866**		**1,545.2860**	**1,545.2860**	**0.0376**		**1,546.2262**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	9.5233	45.9914	110.0422	0.4681	45.9592	0.3373	46.2965	12.2950	0.3132	12.6083		47,917.8005	47,917.8005	2.1953		47,972.6839
Unmitigated	9.5233	45.9914	110.0422	0.4681	45.9592	0.3373	46.2965	12.2950	0.3132	12.6083		47,917.8005	47,917.8005	2.1953		47,972.6839

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Apartments Low Rise	145.75	154.25	154.00	506,227	506,227
Apartments Mid Rise	4,026.75	3,773.25	4075.50	13,660,065	13,660,065
General Office Building	288.45	62.55	31.05	706,812	706,812
High Turnover (Sit Down Restaurant)	2,368.80	2,873.52	2817.72	3,413,937	3,413,937
Hotel	192.00	187.50	160.00	445,703	445,703
Quality Restaurant	501.12	511.92	461.20	707,488	707,488
Regional Shopping Center	528.08	601.44	357.84	1,112,221	1,112,221
Total	8,050.95	8,164.43	8,057.31	20,552,452	20,552,452

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Apartments Low Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3
Apartments Mid Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3
General Office Building	16.60	8.40	6.90	33.00	48.00	19.00	77	19	4
High Turnover (Sit Down	16.60	8.40	6.90	8.50	72.50	19.00	37	20	43
Hotel	16.60	8.40	6.90	19.40	61.60	19.00	58	38	4
Quality Restaurant	16.60	8.40	6.90	12.00	69.00	19.00	38	18	44
Regional Shopping Center	16.60	8.40	6.90	16.30	64.70	19.00	54	35	11

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Apartments Low Rise	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Apartments Mid Rise	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
General Office Building	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
High Turnover (Sit Down Restaurant)	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Hotel	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Quality Restaurant	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Regional Shopping Center	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387
NaturalGas Unmitigated	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Apartments Low Rise	1119.16	0.0121	0.1031	0.0439	6.6000e-004		8.3400e-003	8.3400e-003		8.3400e-003	8.3400e-003		131.6662	131.6662	2.5200e-003	2.4100e-003	132.4486
Apartments Mid Rise	35784.3	0.3859	3.2978	1.4033	0.0211		0.2666	0.2666		0.2666	0.2666		4,209.9164	4,209.9164	0.0807	0.0772	4,234.9339
General Office Building	1283.42	0.0138	0.1258	0.1057	7.5000e-004		9.5600e-003	9.5600e-003		9.5600e-003	9.5600e-003		150.9911	150.9911	2.8900e-003	2.7700e-003	151.8884
High Turnover (Sit Down Restaurant)	22759.9	0.2455	2.2314	1.8743	0.0134		0.1696	0.1696		0.1696	0.1696		2,677.6342	2,677.6342	0.0513	0.0491	2,693.5460
Hotel	4769.72	0.0514	0.4676	0.3928	2.8100e-003		0.0355	0.0355		0.0355	0.0355		561.1436	561.1436	0.0108	0.0103	564.4782
Quality Restaurant	5057.75	0.0545	0.4959	0.4165	2.9800e-003		0.0377	0.0377		0.0377	0.0377		595.0298	595.0298	0.0114	0.0109	598.5658
Regional Shopping Center	251.616	2.7100e-003	0.0247	0.0207	1.5000e-004		1.8700e-003	1.8700e-003		1.8700e-003	1.8700e-003		29.6019	29.6019	5.7000e-004	5.4000e-004	29.7778
Total		**0.7660**	**6.7463**	**4.2573**	**0.0418**		**0.5292**	**0.5292**		**0.5292**	**0.5292**		**8,355.9832**	**8,355.9832**	**0.1602**	**0.1532**	**8,405.6387**

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Apartments Low Rise	1.11916	0.0121	0.1031	0.0439	6.6000e-004		8.3400e-003	8.3400e-003		8.3400e-003	8.3400e-003		131.6662	131.6662	2.5200e-003	2.4100e-003	132.4486
Apartments Mid Rise	35.7843	0.3859	3.2978	1.4033	0.0211		0.2666	0.2666		0.2666	0.2666		4,209.9164	4,209.9164	0.0807	0.0772	4,234.9339
General Office Building	1.28342	0.0138	0.1258	0.1057	7.5000e-004		9.5600e-003	9.5600e-003		9.5600e-003	9.5600e-003		150.9911	150.9911	2.8900e-003	2.7700e-003	151.8884
High Turnover (Sit Down Restaurant)	22.7599	0.2455	2.2314	1.8743	0.0134		0.1696	0.1696		0.1696	0.1696		2,677.6342	2,677.6342	0.0513	0.0491	2,693.5460
Hotel	4.76972	0.0514	0.4676	0.3928	2.8100e-003		0.0355	0.0355		0.0355	0.0355		561.1436	561.1436	0.0108	0.0103	564.4782
Quality Restaurant	5.05775	0.0545	0.4959	0.4165	2.9800e-003		0.0377	0.0377		0.0377	0.0377		595.0298	595.0298	0.0114	0.0109	598.5658
Regional Shopping Center	0.251616	2.7100e-003	0.0247	0.0207	1.5000e-004		1.8700e-003	1.8700e-003		1.8700e-003	1.8700e-003		29.6019	29.6019	5.7000e-004	5.4000e-004	29.7778
Total		**0.7660**	**6.7463**	**4.2573**	**0.0418**		**0.5292**	**0.5292**		**0.5292**	**0.5292**		**8,355.9832**	**8,355.9832**	**0.1602**	**0.1532**	**8,405.6387**

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192
Unmitigated	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	2.2670					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	24.1085					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	1.6500	14.1000	6.0000	0.0900		1.1400	1.1400		1.1400	1.1400	0.0000	18,000.0000	18,000.0000	0.3450	0.3300	18,106.9650
Landscaping	2.4766	0.9496	82.4430	4.3600e-003		0.4574	0.4574		0.4574	0.4574		148.5950	148.5950	0.1424		152.1542
Total	**30.5020**	**15.0496**	**88.4430**	**0.0944**		**1.5974**	**1.5974**		**1.5974**	**1.5974**	**0.0000**	**18,148.5950**	**18,148.5950**	**0.4874**	**0.3300**	**18,259.1192**

6.2 Area by SubCategory

Mitigated

SubCategory	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
	lb/day										lb/day					
Architectural Coating	2.2670					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	24.1085					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	1.6500	14.1000	6.0000	0.0900		1.1400	1.1400		1.1400	1.1400	0.0000	18,000.0000	18,000.0000	0.3450	0.3300	18,106.9650
Landscaping	2.4766	0.9496	82.4430	4.3600e-003		0.4574	0.4574		0.4574	0.4574		148.5950	148.5950	0.1424		152.1542
Total	**30.5020**	**15.0496**	**88.4430**	**0.0944**		**1.5974**	**1.5974**		**1.5974**	**1.5974**	**0.0000**	**18,148.5950**	**18,148.5950**	**0.4874**	**0.3300**	**18,259.1192**

7.0 Water Detail

7.1 Mitigation Measures Water

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

Village South Specific Plan (Proposed)

Los Angeles-South Coast County, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
General Office Building	45.00	1000sqft	1.03	45,000.00	0
High Turnover (Sit Down Restaurant)	36.00	1000sqft	0.83	36,000.00	0
Hotel	50.00	Room	1.67	72,600.00	0
Quality Restaurant	8.00	1000sqft	0.18	8,000.00	0
Apartments Low Rise	25.00	Dwelling Unit	1.56	25,000.00	72
Apartments Mid Rise	975.00	Dwelling Unit	25.66	975,000.00	2789
Regional Shopping Center	56.00	1000sqft	1.29	56,000.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.2	**Precipitation Freq (Days)**	33
Climate Zone	9			**Operational Year**	2028
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	702.44	**CH4 Intensity (lb/MWhr)**	0.029	**N2O Intensity (lb/MWhr)**	0.006

1.3 User Entered Comments & Non-Default Data

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

Project Characteristics - Consistent with the DEIR's model.

Land Use - See SWAPE comment regarding residential and retail land uses.

Construction Phase - See SWAPE comment regarding individual construction phase lengths.

Demolition - Consistent with the DEIR's model. See SWAPE comment regarding demolition.

Vehicle Trips - Saturday trips consistent with the DEIR's model. See SWAPE comment regarding weekday and Sunday trips.

Woodstoves - Woodstoves and wood-burning fireplaces consistent with the DEIR's model. See SWAPE comment regarding gas fireplaces.

Energy Use -

Construction Off-road Equipment Mitigation - See SWAPE comment on construction-related mitigation.

Area Mitigation - See SWAPE comment regarding operational mitigation measures.

Water Mitigation - See SWAPE comment regarding operational mitigation measures.

Trips and VMT - Local hire provision

Table Name	Column Name	Default Value	New Value
tblFireplaces	FireplaceWoodMass	1,019.20	0.00
tblFireplaces	FireplaceWoodMass	1,019.20	0.00
tblFireplaces	NumberWood	1.25	0.00
tblFireplaces	NumberWood	48.75	0.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblVehicleTrips	ST_TR	7.16	6.17
tblVehicleTrips	ST_TR	6.39	3.87
tblVehicleTrips	ST_TR	2.46	1.39
tblVehicleTrips	ST_TR	158.37	79.82

tblVehicleTrips	ST_TR	8.19	3.75
tblVehicleTrips	ST_TR	94.36	63.99
tblVehicleTrips	ST_TR	49.97	10.74
tblVehicleTrips	SU_TR	6.07	6.16
tblVehicleTrips	SU_TR	5.86	4.18
tblVehicleTrips	SU_TR	1.05	0.69
tblVehicleTrips	SU_TR	131.84	78.27
tblVehicleTrips	SU_TR	5.95	3.20
tblVehicleTrips	SU_TR	72.16	57.65
tblVehicleTrips	SU_TR	25.24	6.39
tblVehicleTrips	WD_TR	6.59	5.83
tblVehicleTrips	WD_TR	6.65	4.13
tblVehicleTrips	WD_TR	11.03	6.41
tblVehicleTrips	WD_TR	127.15	65.80
tblVehicleTrips	WD_TR	8.17	3.84
tblVehicleTrips	WD_TR	89.95	62.64
tblVehicleTrips	WD_TR	42.70	9.43
tblWoodstoves	NumberCatalytic	1.25	0.00
tblWoodstoves	NumberCatalytic	48.75	0.00
tblWoodstoves	NumberNoncatalytic	1.25	0.00
tblWoodstoves	NumberNoncatalytic	48.75	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00

2.0 Emissions Summary

2.1 Overall Construction

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2021	0.1704	1.8234	1.1577	2.3800e-003	0.4141	0.0817	0.4958	0.1788	0.0754	0.2542	0.0000	210.7654	210.7654	0.0600	0.0000	212.2661
2022	0.5865	4.0240	5.1546	0.0155	0.9509	0.1175	1.0683	0.2518	0.1103	0.3621	0.0000	1,418.6554	1,418.6554	0.1215	0.0000	1,421.6925
2023	0.5190	3.2850	4.7678	0.0147	0.8497	0.0971	0.9468	0.2283	0.0912	0.3195	0.0000	1,342.4412	1,342.4412	0.1115	0.0000	1,345.2291
2024	4.1592	0.1313	0.2557	5.0000e-004	0.0221	6.3900e-003	0.0285	5.8700e-003	5.9700e-003	0.0118	0.0000	44.6355	44.6355	7.8300e-003	0.0000	44.8311
Maximum	**4.1592**	**4.0240**	**5.1546**	**0.0155**	**0.9509**	**0.1175**	**1.0683**	**0.2518**	**0.1103**	**0.3621**	**0.0000**	**1,418.6554**	**1,418.6554**	**0.1215**	**0.0000**	**1,421.6925**

2.1 Overall Construction

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2021	0.1704	1.8234	1.1577	2.3800e-003	0.4141	0.0817	0.4958	0.1788	0.0754	0.2542	0.0000	210.7651	210.7651	0.0600	0.0000	212.2658
2022	0.5865	4.0240	5.1546	0.0155	0.9509	0.1175	1.0683	0.2518	0.1103	0.3621	0.0000	1,418.6550	1,418.6550	0.1215	0.0000	1,421.6921
2023	0.5190	3.2850	4.7678	0.0147	0.8497	0.0971	0.9468	0.2283	0.0912	0.3195	0.0000	1,342.4409	1,342.4409	0.1115	0.0000	1,345.2287
2024	4.1592	0.1313	0.2557	5.0000e-004	0.0221	6.3900e-003	0.0285	5.8700e-003	5.9700e-003	0.0118	0.0000	44.6354	44.6354	7.8300e-003	0.0000	44.8311
Maximum	**4.1592**	**4.0240**	**5.1546**	**0.0155**	**0.9509**	**0.1175**	**1.0683**	**0.2518**	**0.1103**	**0.3621**	**0.0000**	**1,418.6550**	**1,418.6550**	**0.1215**	**0.0000**	**1,421.6921**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
1	**9-1-2021**	**11-30-2021**	1.4091	1.4091
2	**12-1-2021**	**2-28-2022**	1.3329	1.3329
3	**3-1-2022**	**5-31-2022**	1.1499	1.1499
4	**6-1-2022**	**8-31-2022**	1.1457	1.1457
5	**9-1-2022**	**11-30-2022**	1.1415	1.1415
6	**12-1-2022**	**2-28-2023**	1.0278	1.0278
7	**3-1-2023**	**5-31-2023**	0.9868	0.9868
8	**6-1-2023**	**8-31-2023**	0.9831	0.9831

9	**9-1-2023**	**11-30-2023**	0.9798	0.9798
10	**12-1-2023**	**2-29-2024**	2.8757	2.8757
11	**3-1-2024**	**5-31-2024**	1.6188	1.6188
		Highest	2.8757	2.8757

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	5.1437	0.2950	10.3804	1.6700e-003		0.0714	0.0714		0.0714	0.0714	0.0000	220.9670	220.9670	0.0201	3.7400e-003	222.5835
Energy	0.1398	1.2312	0.7770	7.6200e-003		0.0966	0.0966		0.0966	0.0966	0.0000	3,896.0732	3,896.0732	0.1303	0.0468	3,913.2833
Mobile	1.5857	7.9962	19.1834	0.0821	7.7979	0.0580	7.8559	2.0895	0.0539	2.1434	0.0000	7,620.4986	7,620.4986	0.3407	0.0000	7,629.0162
Waste						0.0000	0.0000		0.0000	0.0000	207.8079	0.0000	207.8079	12.2811	0.0000	514.8354
Water						0.0000	0.0000		0.0000	0.0000	29.1632	556.6420	585.8052	3.0183	0.0755	683.7567
Total	**6.8692**	**9.5223**	**30.3407**	**0.0914**	**7.7979**	**0.2260**	**8.0240**	**2.0895**	**0.2219**	**2.3114**	**236.9712**	**12,294.1807**	**12,531.1519**	**15.7904**	**0.1260**	**12,963.4751**

2.2 Overall Operational

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	5.1437	0.2950	10.3804	1.6700e-003		0.0714	0.0714		0.0714	0.0714	0.0000	220.9670	220.9670	0.0201	3.7400e-003	222.5835
Energy	0.1398	1.2312	0.7770	7.6200e-003		0.0966	0.0966		0.0966	0.0966	0.0000	3,896.0732	3,896.0732	0.1303	0.0468	3,913.2833
Mobile	1.5857	7.9962	19.1834	0.0821	7.7979	0.0580	7.8559	2.0895	0.0539	2.1434	0.0000	7,620.4986	7,620.4986	0.3407	0.0000	7,629.0162
Waste						0.0000	0.0000		0.0000	0.0000	207.8079	0.0000	207.8079	12.2811	0.0000	514.8354
Water						0.0000	0.0000		0.0000	0.0000	29.1632	556.6420	585.8052	3.0183	0.0755	683.7567
Total	**6.8692**	**9.5223**	**30.3407**	**0.0914**	**7.7979**	**0.2260**	**8.0240**	**2.0895**	**0.2219**	**2.3114**	**236.9712**	**12,294.1807**	**12,531.1519**	**15.7904**	**0.1260**	**12,963.4751**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

3.0 Construction Detail

Construction Phase

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	9/1/2021	10/12/2021	5	30	
2	Site Preparation	Site Preparation	10/13/2021	11/9/2021	5	20	
3	Grading	Grading	11/10/2021	1/11/2022	5	45	
4	Building Construction	Building Construction	1/12/2022	12/12/2023	5	500	
5	Paving	Paving	12/13/2023	1/30/2024	5	35	
6	Architectural Coating	Architectural Coating	1/31/2024	3/19/2024	5	35	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 112.5

Acres of Paving: 0

Residential Indoor: 2,025,000; Residential Outdoor: 675,000; Non-Residential Indoor: 326,400; Non-Residential Outdoor: 108,800; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Demolition	Excavators	3	8.00	158	0.38
Demolition	Rubber Tired Dozers	2	8.00	247	0.40
Site Preparation	Rubber Tired Dozers	3	8.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	4	8.00	97	0.37
Grading	Excavators	2	8.00	158	0.38
Grading	Graders	1	8.00	187	0.41
Grading	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Scrapers	2	8.00	367	0.48
Grading	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Building Construction	Cranes	1	7.00	231	0.29
Building Construction	Forklifts	3	8.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	3	7.00	97	0.37
Building Construction	Welders	1	8.00	46	0.45
Paving	Pavers	2	8.00	130	0.42
Paving	Paving Equipment	2	8.00	132	0.36
Paving	Rollers	2	8.00	80	0.38
Architectural Coating	Air Compressors	1	6.00	78	0.48

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	6	15.00	0.00	458.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	7	18.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	8	20.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	801.00	143.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	160.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Demolition - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0496	0.0000	0.0496	7.5100e-003	0.0000	7.5100e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0475	0.4716	0.3235	5.8000e-004		0.0233	0.0233		0.0216	0.0216	0.0000	51.0012	51.0012	0.0144	0.0000	51.3601
Total	**0.0475**	**0.4716**	**0.3235**	**5.8000e-004**	**0.0496**	**0.0233**	**0.0729**	**7.5100e-003**	**0.0216**	**0.0291**	**0.0000**	**51.0012**	**51.0012**	**0.0144**	**0.0000**	**51.3601**

3.2 Demolition - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	1.9300e-003	0.0634	0.0148	1.8000e-004	3.9400e-003	1.9000e-004	4.1300e-003	1.0800e-003	1.8000e-004	1.2600e-003	0.0000	17.4566	17.4566	1.2100e-003	0.0000	17.4869
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	7.2000e-004	5.3000e-004	6.0900e-003	2.0000e-005	1.6800e-003	1.0000e-005	1.6900e-003	4.5000e-004	1.0000e-005	4.6000e-004	0.0000	1.5281	1.5281	5.0000e-005	0.0000	1.5293
Total	**2.6500e-003**	**0.0639**	**0.0209**	**2.0000e-004**	**5.6200e-003**	**2.0000e-004**	**5.8200e-003**	**1.5300e-003**	**1.9000e-004**	**1.7200e-003**	**0.0000**	**18.9847**	**18.9847**	**1.2600e-003**	**0.0000**	**19.0161**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0496	0.0000	0.0496	7.5100e-003	0.0000	7.5100e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0475	0.4716	0.3235	5.8000e-004		0.0233	0.0233		0.0216	0.0216	0.0000	51.0011	51.0011	0.0144	0.0000	51.3600
Total	**0.0475**	**0.4716**	**0.3235**	**5.8000e-004**	**0.0496**	**0.0233**	**0.0729**	**7.5100e-003**	**0.0216**	**0.0291**	**0.0000**	**51.0011**	**51.0011**	**0.0144**	**0.0000**	**51.3600**

3.2 Demolition - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	1.9300e-003	0.0634	0.0148	1.8000e-004	3.9400e-003	1.9000e-004	4.1300e-003	1.0800e-003	1.8000e-004	1.2600e-003	0.0000	17.4566	17.4566	1.2100e-003	0.0000	17.4869
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	7.2000e-004	5.3000e-004	6.0900e-003	2.0000e-005	1.6800e-003	1.0000e-005	1.6900e-003	4.5000e-004	1.0000e-005	4.6000e-004	0.0000	1.5281	1.5281	5.0000e-005	0.0000	1.5293
Total	**2.6500e-003**	**0.0639**	**0.0209**	**2.0000e-004**	**5.6200e-003**	**2.0000e-004**	**5.8200e-003**	**1.5300e-003**	**1.9000e-004**	**1.7200e-003**	**0.0000**	**18.9847**	**18.9847**	**1.2600e-003**	**0.0000**	**19.0161**

3.3 Site Preparation - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.1807	0.0000	0.1807	0.0993	0.0000	0.0993	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0389	0.4050	0.2115	3.8000e-004		0.0204	0.0204		0.0188	0.0188	0.0000	33.4357	33.4357	0.0108	0.0000	33.7061
Total	**0.0389**	**0.4050**	**0.2115**	**3.8000e-004**	**0.1807**	**0.0204**	**0.2011**	**0.0993**	**0.0188**	**0.1181**	**0.0000**	**33.4357**	**33.4357**	**0.0108**	**0.0000**	**33.7061**

3.3 Site Preparation - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.8000e-004	4.3000e-004	4.8700e-003	1.0000e-005	1.3400e-003	1.0000e-005	1.3500e-003	3.6000e-004	1.0000e-005	3.7000e-004	0.0000	1.2225	1.2225	4.0000e-005	0.0000	1.2234
Total	**5.8000e-004**	**4.3000e-004**	**4.8700e-003**	**1.0000e-005**	**1.3400e-003**	**1.0000e-005**	**1.3500e-003**	**3.6000e-004**	**1.0000e-005**	**3.7000e-004**	**0.0000**	**1.2225**	**1.2225**	**4.0000e-005**	**0.0000**	**1.2234**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.1807	0.0000	0.1807	0.0993	0.0000	0.0993	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0389	0.4050	0.2115	3.8000e-004		0.0204	0.0204		0.0188	0.0188	0.0000	33.4357	33.4357	0.0108	0.0000	33.7060
Total	**0.0389**	**0.4050**	**0.2115**	**3.8000e-004**	**0.1807**	**0.0204**	**0.2011**	**0.0993**	**0.0188**	**0.1181**	**0.0000**	**33.4357**	**33.4357**	**0.0108**	**0.0000**	**33.7060**

3.3 Site Preparation - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.8000e-004	4.3000e-004	4.8700e-003	1.0000e-005	1.3400e-003	1.0000e-005	1.3500e-003	3.6000e-004	1.0000e-005	3.7000e-004	0.0000	1.2225	1.2225	4.0000e-005	0.0000	1.2234
Total	**5.8000e-004**	**4.3000e-004**	**4.8700e-003**	**1.0000e-005**	**1.3400e-003**	**1.0000e-005**	**1.3500e-003**	**3.6000e-004**	**1.0000e-005**	**3.7000e-004**	**0.0000**	**1.2225**	**1.2225**	**4.0000e-005**	**0.0000**	**1.2234**

3.4 Grading - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.1741	0.0000	0.1741	0.0693	0.0000	0.0693	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0796	0.8816	0.5867	1.1800e-003		0.0377	0.0377		0.0347	0.0347	0.0000	103.5405	103.5405	0.0335	0.0000	104.3776
Total	**0.0796**	**0.8816**	**0.5867**	**1.1800e-003**	**0.1741**	**0.0377**	**0.2118**	**0.0693**	**0.0347**	**0.1040**	**0.0000**	**103.5405**	**103.5405**	**0.0335**	**0.0000**	**104.3776**

3.4 Grading - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.2200e-003	9.0000e-004	0.0103	3.0000e-005	2.8300e-003	2.0000e-005	2.8600e-003	7.5000e-004	2.0000e-005	7.8000e-004	0.0000	2.5808	2.5808	8.0000e-005	0.0000	2.5828
Total	**1.2200e-003**	**9.0000e-004**	**0.0103**	**3.0000e-005**	**2.8300e-003**	**2.0000e-005**	**2.8600e-003**	**7.5000e-004**	**2.0000e-005**	**7.8000e-004**	**0.0000**	**2.5808**	**2.5808**	**8.0000e-005**	**0.0000**	**2.5828**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.1741	0.0000	0.1741	0.0693	0.0000	0.0693	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0796	0.8816	0.5867	1.1800e-003		0.0377	0.0377		0.0347	0.0347	0.0000	103.5403	103.5403	0.0335	0.0000	104.3775
Total	**0.0796**	**0.8816**	**0.5867**	**1.1800e-003**	**0.1741**	**0.0377**	**0.2118**	**0.0693**	**0.0347**	**0.1040**	**0.0000**	**103.5403**	**103.5403**	**0.0335**	**0.0000**	**104.3775**

3.4 Grading - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.2200e-003	9.0000e-004	0.0103	3.0000e-005	2.8300e-003	2.0000e-005	2.8600e-003	7.5000e-004	2.0000e-005	7.8000e-004	0.0000	2.5808	2.5808	8.0000e-005	0.0000	2.5828
Total	**1.2200e-003**	**9.0000e-004**	**0.0103**	**3.0000e-005**	**2.8300e-003**	**2.0000e-005**	**2.8600e-003**	**7.5000e-004**	**2.0000e-005**	**7.8000e-004**	**0.0000**	**2.5808**	**2.5808**	**8.0000e-005**	**0.0000**	**2.5828**

3.4 Grading - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0807	0.0000	0.0807	0.0180	0.0000	0.0180	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0127	0.1360	0.1017	2.2000e-004		5.7200e-003	5.7200e-003		5.2600e-003	5.2600e-003	0.0000	19.0871	19.0871	6.1700e-003	0.0000	19.2414
Total	**0.0127**	**0.1360**	**0.1017**	**2.2000e-004**	**0.0807**	**5.7200e-003**	**0.0865**	**0.0180**	**5.2600e-003**	**0.0233**	**0.0000**	**19.0871**	**19.0871**	**6.1700e-003**	**0.0000**	**19.2414**

3.4 Grading - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.1000e-004	1.5000e-004	1.7400e-003	1.0000e-005	5.2000e-004	0.0000	5.3000e-004	1.4000e-004	0.0000	1.4000e-004	0.0000	0.4587	0.4587	1.0000e-005	0.0000	0.4590
Total	**2.1000e-004**	**1.5000e-004**	**1.7400e-003**	**1.0000e-005**	**5.2000e-004**	**0.0000**	**5.3000e-004**	**1.4000e-004**	**0.0000**	**1.4000e-004**	**0.0000**	**0.4587**	**0.4587**	**1.0000e-005**	**0.0000**	**0.4590**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0807	0.0000	0.0807	0.0180	0.0000	0.0180	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0127	0.1360	0.1017	2.2000e-004		5.7200e-003	5.7200e-003		5.2600e-003	5.2600e-003	0.0000	19.0871	19.0871	6.1700e-003	0.0000	19.2414
Total	**0.0127**	**0.1360**	**0.1017**	**2.2000e-004**	**0.0807**	**5.7200e-003**	**0.0865**	**0.0180**	**5.2600e-003**	**0.0233**	**0.0000**	**19.0871**	**19.0871**	**6.1700e-003**	**0.0000**	**19.2414**

3.4 Grading - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.1000e-004	1.5000e-004	1.7400e-003	1.0000e-005	5.2000e-004	0.0000	5.3000e-004	1.4000e-004	0.0000	1.4000e-004	0.0000	0.4587	0.4587	1.0000e-005	0.0000	0.4590
Total	**2.1000e-004**	**1.5000e-004**	**1.7400e-003**	**1.0000e-005**	**5.2000e-004**	**0.0000**	**5.3000e-004**	**1.4000e-004**	**0.0000**	**1.4000e-004**	**0.0000**	**0.4587**	**0.4587**	**1.0000e-005**	**0.0000**	**0.4590**

3.5 Building Construction - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.2158	1.9754	2.0700	3.4100e-003		0.1023	0.1023		0.0963	0.0963	0.0000	293.1324	293.1324	0.0702	0.0000	294.8881
Total	**0.2158**	**1.9754**	**2.0700**	**3.4100e-003**		**0.1023**	**0.1023**		**0.0963**	**0.0963**	**0.0000**	**293.1324**	**293.1324**	**0.0702**	**0.0000**	**294.8881**

3.5 Building Construction - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0527	1.6961	0.4580	4.5500e-003	0.1140	3.1800e-003	0.1171	0.0329	3.0400e-003	0.0359	0.0000	441.9835	441.9835	0.0264	0.0000	442.6435
Worker	0.3051	0.2164	2.5233	7.3500e-003	0.7557	6.2300e-003	0.7619	0.2007	5.7400e-003	0.2065	0.0000	663.9936	663.9936	0.0187	0.0000	664.4604
Total	**0.3578**	**1.9125**	**2.9812**	**0.0119**	**0.8696**	**9.4100e-003**	**0.8790**	**0.2336**	**8.7800e-003**	**0.2424**	**0.0000**	**1,105.9771**	**1,105.9771**	**0.0451**	**0.0000**	**1,107.1039**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.2158	1.9754	2.0700	3.4100e-003		0.1023	0.1023		0.0963	0.0963	0.0000	293.1321	293.1321	0.0702	0.0000	294.8877
Total	**0.2158**	**1.9754**	**2.0700**	**3.4100e-003**		**0.1023**	**0.1023**		**0.0963**	**0.0963**	**0.0000**	**293.1321**	**293.1321**	**0.0702**	**0.0000**	**294.8877**

3.5 Building Construction - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0527	1.6961	0.4580	4.5500e-003	0.1140	3.1800e-003	0.1171	0.0329	3.0400e-003	0.0359	0.0000	441.9835	441.9835	0.0264	0.0000	442.6435
Worker	0.3051	0.2164	2.5233	7.3500e-003	0.7557	6.2300e-003	0.7619	0.2007	5.7400e-003	0.2065	0.0000	663.9936	663.9936	0.0187	0.0000	664.4604
Total	**0.3578**	**1.9125**	**2.9812**	**0.0119**	**0.8696**	**9.4100e-003**	**0.8790**	**0.2336**	**8.7800e-003**	**0.2424**	**0.0000**	**1,105.9771**	**1,105.9771**	**0.0451**	**0.0000**	**1,107.1039**

3.5 Building Construction - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1942	1.7765	2.0061	3.3300e-003		0.0864	0.0864		0.0813	0.0813	0.0000	286.2789	286.2789	0.0681	0.0000	287.9814
Total	**0.1942**	**1.7765**	**2.0061**	**3.3300e-003**		**0.0864**	**0.0864**		**0.0813**	**0.0813**	**0.0000**	**286.2789**	**286.2789**	**0.0681**	**0.0000**	**287.9814**

3.5 Building Construction - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0382	1.2511	0.4011	4.3000e-003	0.1113	1.4600e-003	0.1127	0.0321	1.4000e-003	0.0335	0.0000	417.9930	417.9930	0.0228	0.0000	418.5624
Worker	0.2795	0.1910	2.2635	6.9100e-003	0.7377	5.9100e-003	0.7436	0.1960	5.4500e-003	0.2014	0.0000	624.5363	624.5363	0.0164	0.0000	624.9466
Total	**0.3177**	**1.4420**	**2.6646**	**0.0112**	**0.8490**	**7.3700e-003**	**0.8564**	**0.2281**	**6.8500e-003**	**0.2349**	**0.0000**	**1,042.5294**	**1,042.5294**	**0.0392**	**0.0000**	**1,043.5090**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1942	1.7765	2.0061	3.3300e-003		0.0864	0.0864		0.0813	0.0813	0.0000	286.2785	286.2785	0.0681	0.0000	287.9811
Total	**0.1942**	**1.7765**	**2.0061**	**3.3300e-003**		**0.0864**	**0.0864**		**0.0813**	**0.0813**	**0.0000**	**286.2785**	**286.2785**	**0.0681**	**0.0000**	**287.9811**

3.5 Building Construction - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0382	1.2511	0.4011	4.3000e-003	0.1113	1.4600e-003	0.1127	0.0321	1.4000e-003	0.0335	0.0000	417.9930	417.9930	0.0228	0.0000	418.5624
Worker	0.2795	0.1910	2.2635	6.9100e-003	0.7377	5.9100e-003	0.7436	0.1960	5.4500e-003	0.2014	0.0000	624.5363	624.5363	0.0164	0.0000	624.9466
Total	**0.3177**	**1.4420**	**2.6646**	**0.0112**	**0.8490**	**7.3700e-003**	**0.8564**	**0.2281**	**6.8500e-003**	**0.2349**	**0.0000**	**1,042.5294**	**1,042.5294**	**0.0392**	**0.0000**	**1,043.5090**

3.6 Paving - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	6.7100e-003	0.0663	0.0948	1.5000e-004		3.3200e-003	3.3200e-003		3.0500e-003	3.0500e-003	0.0000	13.0175	13.0175	4.2100e-003	0.0000	13.1227
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**6.7100e-003**	**0.0663**	**0.0948**	**1.5000e-004**		**3.3200e-003**	**3.3200e-003**		**3.0500e-003**	**3.0500e-003**	**0.0000**	**13.0175**	**13.0175**	**4.2100e-003**	**0.0000**	**13.1227**

3.6 Paving - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.8000e-004	1.9000e-004	2.2300e-003	1.0000e-005	7.3000e-004	1.0000e-005	7.3000e-004	1.9000e-004	1.0000e-005	2.0000e-004	0.0000	0.6156	0.6156	2.0000e-005	0.0000	0.6160
Total	**2.8000e-004**	**1.9000e-004**	**2.2300e-003**	**1.0000e-005**	**7.3000e-004**	**1.0000e-005**	**7.3000e-004**	**1.9000e-004**	**1.0000e-005**	**2.0000e-004**	**0.0000**	**0.6156**	**0.6156**	**2.0000e-005**	**0.0000**	**0.6160**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	6.7100e-003	0.0663	0.0948	1.5000e-004		3.3200e-003	3.3200e-003		3.0500e-003	3.0500e-003	0.0000	13.0175	13.0175	4.2100e-003	0.0000	13.1227
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**6.7100e-003**	**0.0663**	**0.0948**	**1.5000e-004**		**3.3200e-003**	**3.3200e-003**		**3.0500e-003**	**3.0500e-003**	**0.0000**	**13.0175**	**13.0175**	**4.2100e-003**	**0.0000**	**13.1227**

3.6 Paving - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.8000e-004	1.9000e-004	2.2300e-003	1.0000e-005	7.3000e-004	1.0000e-005	7.3000e-004	1.9000e-004	1.0000e-005	2.0000e-004	0.0000	0.6156	0.6156	2.0000e-005	0.0000	0.6160
Total	**2.8000e-004**	**1.9000e-004**	**2.2300e-003**	**1.0000e-005**	**7.3000e-004**	**1.0000e-005**	**7.3000e-004**	**1.9000e-004**	**1.0000e-005**	**2.0000e-004**	**0.0000**	**0.6156**	**0.6156**	**2.0000e-005**	**0.0000**	**0.6160**

3.6 Paving - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0109	0.1048	0.1609	2.5000e-004		5.1500e-003	5.1500e-003		4.7400e-003	4.7400e-003	0.0000	22.0292	22.0292	7.1200e-003	0.0000	22.2073
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0109**	**0.1048**	**0.1609**	**2.5000e-004**		**5.1500e-003**	**5.1500e-003**		**4.7400e-003**	**4.7400e-003**	**0.0000**	**22.0292**	**22.0292**	**7.1200e-003**	**0.0000**	**22.2073**

3.6 Paving - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	4.4000e-004	2.9000e-004	3.5100e-003	1.0000e-005	1.2300e-003	1.0000e-005	1.2400e-003	3.3000e-004	1.0000e-005	3.4000e-004	0.0000	1.0094	1.0094	3.0000e-005	0.0000	1.0100
Total	**4.4000e-004**	**2.9000e-004**	**3.5100e-003**	**1.0000e-005**	**1.2300e-003**	**1.0000e-005**	**1.2400e-003**	**3.3000e-004**	**1.0000e-005**	**3.4000e-004**	**0.0000**	**1.0094**	**1.0094**	**3.0000e-005**	**0.0000**	**1.0100**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0109	0.1048	0.1609	2.5000e-004		5.1500e-003	5.1500e-003		4.7400e-003	4.7400e-003	0.0000	22.0292	22.0292	7.1200e-003	0.0000	22.2073
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0109**	**0.1048**	**0.1609**	**2.5000e-004**		**5.1500e-003**	**5.1500e-003**		**4.7400e-003**	**4.7400e-003**	**0.0000**	**22.0292**	**22.0292**	**7.1200e-003**	**0.0000**	**22.2073**

3.6 Paving - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	4.4000e-004	2.9000e-004	3.5100e-003	1.0000e-005	1.2300e-003	1.0000e-005	1.2400e-003	3.3000e-004	1.0000e-005	3.4000e-004	0.0000	1.0094	1.0094	3.0000e-005	0.0000	1.0100
Total	**4.4000e-004**	**2.9000e-004**	**3.5100e-003**	**1.0000e-005**	**1.2300e-003**	**1.0000e-005**	**1.2400e-003**	**3.3000e-004**	**1.0000e-005**	**3.4000e-004**	**0.0000**	**1.0094**	**1.0094**	**3.0000e-005**	**0.0000**	**1.0100**

3.7 Architectural Coating - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	4.1372					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	3.1600e-003	0.0213	0.0317	5.0000e-005		1.0700e-003	1.0700e-003		1.0700e-003	1.0700e-003	0.0000	4.4682	4.4682	2.5000e-004	0.0000	4.4745
Total	**4.1404**	**0.0213**	**0.0317**	**5.0000e-005**		**1.0700e-003**	**1.0700e-003**		**1.0700e-003**	**1.0700e-003**	**0.0000**	**4.4682**	**4.4682**	**2.5000e-004**	**0.0000**	**4.4745**

3.7 Architectural Coating - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	7.4800e-003	4.9300e-003	0.0596	1.9000e-004	0.0209	1.6000e-004	0.0211	5.5500e-003	1.5000e-004	5.7000e-003	0.0000	17.1287	17.1287	4.3000e-004	0.0000	17.1394
Total	**7.4800e-003**	**4.9300e-003**	**0.0596**	**1.9000e-004**	**0.0209**	**1.6000e-004**	**0.0211**	**5.5500e-003**	**1.5000e-004**	**5.7000e-003**	**0.0000**	**17.1287**	**17.1287**	**4.3000e-004**	**0.0000**	**17.1394**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	4.1372					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	3.1600e-003	0.0213	0.0317	5.0000e-005		1.0700e-003	1.0700e-003		1.0700e-003	1.0700e-003	0.0000	4.4682	4.4682	2.5000e-004	0.0000	4.4745
Total	**4.1404**	**0.0213**	**0.0317**	**5.0000e-005**		**1.0700e-003**	**1.0700e-003**		**1.0700e-003**	**1.0700e-003**	**0.0000**	**4.4682**	**4.4682**	**2.5000e-004**	**0.0000**	**4.4745**

3.7 Architectural Coating - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	7.4800e-003	4.9300e-003	0.0596	1.9000e-004	0.0209	1.6000e-004	0.0211	5.5500e-003	1.5000e-004	5.7000e-003	0.0000	17.1287	17.1287	4.3000e-004	0.0000	17.1394
Total	**7.4800e-003**	**4.9300e-003**	**0.0596**	**1.9000e-004**	**0.0209**	**1.6000e-004**	**0.0211**	**5.5500e-003**	**1.5000e-004**	**5.7000e-003**	**0.0000**	**17.1287**	**17.1287**	**4.3000e-004**	**0.0000**	**17.1394**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	1.5857	7.9962	19.1834	0.0821	7.7979	0.0580	7.8559	2.0895	0.0539	2.1434	0.0000	7,620.4986	7,620.4986	0.3407	0.0000	7,629.0162
Unmitigated	1.5857	7.9962	19.1834	0.0821	7.7979	0.0580	7.8559	2.0895	0.0539	2.1434	0.0000	7,620.4986	7,620.4986	0.3407	0.0000	7,629.0162

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Apartments Low Rise	145.75	154.25	154.00	506,227	506,227
Apartments Mid Rise	4,026.75	3,773.25	4075.50	13,660,065	13,660,065
General Office Building	288.45	62.55	31.05	706,812	706,812
High Turnover (Sit Down Restaurant)	2,368.80	2,873.52	2817.72	3,413,937	3,413,937
Hotel	192.00	187.50	160.00	445,703	445,703
Quality Restaurant	501.12	511.92	461.20	707,488	707,488
Regional Shopping Center	528.08	601.44	357.84	1,112,221	1,112,221
Total	8,050.95	8,164.43	8,057.31	20,552,452	20,552,452

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Apartments Low Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3
Apartments Mid Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3
General Office Building	16.60	8.40	6.90	33.00	48.00	19.00	77	19	4
High Turnover (Sit Down	16.60	8.40	6.90	8.50	72.50	19.00	37	20	43
Hotel	16.60	8.40	6.90	19.40	61.60	19.00	58	38	4
Quality Restaurant	16.60	8.40	6.90	12.00	69.00	19.00	38	18	44
Regional Shopping Center	16.60	8.40	6.90	16.30	64.70	19.00	54	35	11

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Apartments Low Rise	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Apartments Mid Rise	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
General Office Building	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
High Turnover (Sit Down Restaurant)	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Hotel	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Quality Restaurant	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Regional Shopping Center	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	2,512.6465	2,512.6465	0.1037	0.0215	2,521.6356
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	2,512.6465	2,512.6465	0.1037	0.0215	2,521.6356
NaturalGas Mitigated	0.1398	1.2312	0.7770	7.6200e-003		0.0966	0.0966		0.0966	0.0966	0.0000	1,383.4267	1,383.4267	0.0265	0.0254	1,391.6478
NaturalGas Unmitigated	0.1398	1.2312	0.7770	7.6200e-003		0.0966	0.0966		0.0966	0.0966	0.0000	1,383.4267	1,383.4267	0.0265	0.0254	1,391.6478

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Apartments Low Rise	408494	2.2000e-003	0.0188	8.0100e-003	1.2000e-004		1.5200e-003	1.5200e-003		1.5200e-003	1.5200e-003	0.0000	21.7988	21.7988	4.2000e-004	4.0000e-004	21.9284
Apartments Mid Rise	1.30613e+007	0.0704	0.6018	0.2561	3.8400e-003		0.0487	0.0487		0.0487	0.0487	0.0000	696.9989	696.9989	0.0134	0.0128	701.1408
General Office Building	468450	2.5300e-003	0.0230	0.0193	1.4000e-004		1.7500e-003	1.7500e-003		1.7500e-003	1.7500e-003	0.0000	24.9983	24.9983	4.8000e-004	4.6000e-004	25.1468
High Turnover (Sit Down Restaurant)	8.30736e+006	0.0448	0.4072	0.3421	2.4400e-003		0.0310	0.0310		0.0310	0.0310	0.0000	443.3124	443.3124	8.5000e-003	8.1300e-003	445.9468
Hotel	1.74095e+006	9.3900e-003	0.0853	0.0717	5.1000e-004		6.4900e-003	6.4900e-003		6.4900e-003	6.4900e-003	0.0000	92.9036	92.9036	1.7800e-003	1.7000e-003	93.4557
Quality Restaurant	1.84608e+006	9.9500e-003	0.0905	0.0760	5.4000e-004		6.8800e-003	6.8800e-003		6.8800e-003	6.8800e-003	0.0000	98.5139	98.5139	1.8900e-003	1.8100e-003	99.0993
Regional Shopping Center	91840	5.0000e-004	4.5000e-003	3.7800e-003	3.0000e-005		3.4000e-004	3.4000e-004		3.4000e-004	3.4000e-004	0.0000	4.9009	4.9009	9.0000e-005	9.0000e-005	4.9301
Total		**0.1398**	**1.2312**	**0.7770**	**7.6200e-003**		**0.0966**	**0.0966**		**0.0966**	**0.0966**	**0.0000**	**1,383.4268**	**1,383.4268**	**0.0265**	**0.0254**	**1,391.6478**

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Apartments Low Rise	408494	2.2000e-003	0.0188	8.0100e-003	1.2000e-004		1.5200e-003	1.5200e-003		1.5200e-003	1.5200e-003	0.0000	21.7988	21.7988	4.2000e-004	4.0000e-004	21.9284
Apartments Mid Rise	1.30613e+007	0.0704	0.6018	0.2561	3.8400e-003		0.0487	0.0487		0.0487	0.0487	0.0000	696.9989	696.9989	0.0134	0.0128	701.1408
General Office Building	468450	2.5300e-003	0.0230	0.0193	1.4000e-004		1.7500e-003	1.7500e-003		1.7500e-003	1.7500e-003	0.0000	24.9983	24.9983	4.8000e-004	4.6000e-004	25.1468
High Turnover (Sit Down Restaurant)	8.30736e+006	0.0448	0.4072	0.3421	2.4400e-003		0.0310	0.0310		0.0310	0.0310	0.0000	443.3124	443.3124	8.5000e-003	8.1300e-003	445.9468
Hotel	1.74095e+006	9.3900e-003	0.0853	0.0717	5.1000e-004		6.4900e-003	6.4900e-003		6.4900e-003	6.4900e-003	0.0000	92.9036	92.9036	1.7800e-003	1.7000e-003	93.4557
Quality Restaurant	1.84608e+006	9.9500e-003	0.0905	0.0760	5.4000e-004		6.8800e-003	6.8800e-003		6.8800e-003	6.8800e-003	0.0000	98.5139	98.5139	1.8900e-003	1.8100e-003	99.0993
Regional Shopping Center	91840	5.0000e-004	4.5000e-003	3.7800e-003	3.0000e-005		3.4000e-004	3.4000e-004		3.4000e-004	3.4000e-004	0.0000	4.9009	4.9009	9.0000e-005	9.0000e-005	4.9301
Total		**0.1398**	**1.2312**	**0.7770**	**7.6200e-003**		**0.0966**	**0.0966**		**0.0966**	**0.0966**	**0.0000**	**1,383.4268**	**1,383.4268**	**0.0265**	**0.0254**	**1,391.6478**

5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Apartments Low Rise	106010	33.7770	1.3900e-003	2.9000e-004	33.8978
Apartments Mid Rise	3.94697e+006	1,257.5879	0.0519	0.0107	1,262.0869
General Office Building	584550	186.2502	7.6900e-003	1.5900e-003	186.9165
High Turnover (Sit Down Restaurant)	1.58904e+006	506.3022	0.0209	4.3200e-003	508.1135
Hotel	550308	175.3399	7.2400e-003	1.5000e-003	175.9672
Quality Restaurant	353120	112.5116	4.6500e-003	9.6000e-004	112.9141
Regional Shopping Center	756000	240.8778	9.9400e-003	2.0600e-003	241.7395
Total		**2,512.6465**	**0.1037**	**0.0215**	**2,521.6356**

5.3 Energy by Land Use - Electricity

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Apartments Low Rise	106010	33.7770	1.3900e-003	2.9000e-004	33.8978
Apartments Mid Rise	3.94697e+006	1,257.5879	0.0519	0.0107	1,262.0869
General Office Building	584550	186.2502	7.6900e-003	1.5900e-003	186.9165
High Turnover (Sit Down Restaurant)	1.58904e+006	506.3022	0.0209	4.3200e-003	508.1135
Hotel	550308	175.3399	7.2400e-003	1.5000e-003	175.9672
Quality Restaurant	353120	112.5116	4.6500e-003	9.6000e-004	112.9141
Regional Shopping Center	756000	240.8778	9.9400e-003	2.0600e-003	241.7395
Total		**2,512.6465**	**0.1037**	**0.0215**	**2,521.6356**

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	5.1437	0.2950	10.3804	1.6700e-003		0.0714	0.0714		0.0714	0.0714	0.0000	220.9670	220.9670	0.0201	3.7400e-003	222.5835
Unmitigated	5.1437	0.2950	10.3804	1.6700e-003		0.0714	0.0714		0.0714	0.0714	0.0000	220.9670	220.9670	0.0201	3.7400e-003	222.5835

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.4137					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	4.3998					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	0.0206	0.1763	0.0750	1.1200e-003		0.0143	0.0143		0.0143	0.0143	0.0000	204.1166	204.1166	3.9100e-003	3.7400e-003	205.3295
Landscaping	0.3096	0.1187	10.3054	5.4000e-004		0.0572	0.0572		0.0572	0.0572	0.0000	16.8504	16.8504	0.0161	0.0000	17.2540
Total	**5.1437**	**0.2950**	**10.3804**	**1.6600e-003**		**0.0714**	**0.0714**		**0.0714**	**0.0714**	**0.0000**	**220.9670**	**220.9670**	**0.0201**	**3.7400e-003**	**222.5835**

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.4137					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	4.3998					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	0.0206	0.1763	0.0750	1.1200e-003		0.0143	0.0143		0.0143	0.0143	0.0000	204.1166	204.1166	3.9100e-003	3.7400e-003	205.3295
Landscaping	0.3096	0.1187	10.3054	5.4000e-004		0.0572	0.0572		0.0572	0.0572	0.0000	16.8504	16.8504	0.0161	0.0000	17.2540
Total	**5.1437**	**0.2950**	**10.3804**	**1.6600e-003**		**0.0714**	**0.0714**		**0.0714**	**0.0714**	**0.0000**	**220.9670**	**220.9670**	**0.0201**	**3.7400e-003**	**222.5835**

7.0 Water Detail

7.1 Mitigation Measures Water

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	585.8052	3.0183	0.0755	683.7567
Unmitigated	585.8052	3.0183	0.0755	683.7567

7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Apartments Low Rise	1.62885 / 1.02688	10.9095	0.0535	1.3400e-003	12.6471
Apartments Mid Rise	63.5252 / 40.0485	425.4719	2.0867	0.0523	493.2363
General Office Building	7.99802 / 4.90201	53.0719	0.2627	6.5900e-003	61.6019
High Turnover (Sit Down Restaurant)	10.9272 / 0.697482	51.2702	0.3580	8.8200e-003	62.8482
Hotel	1.26834 / 0.140927	6.1633	0.0416	1.0300e-003	7.5079
Quality Restaurant	2.42827 / 0.154996	11.3934	0.0796	1.9600e-003	13.9663
Regional Shopping Center	4.14806 / 2.54236	27.5250	0.1363	3.4200e-003	31.9490
Total		**585.8052**	**3.0183**	**0.0755**	**683.7567**

7.2 Water by Land Use

Mitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Apartments Low Rise	1.62885 / 1.02688	10.9095	0.0535	1.3400e-003	12.6471
Apartments Mid Rise	63.5252 / 40.0485	425.4719	2.0867	0.0523	493.2363
General Office Building	7.99802 / 4.90201	53.0719	0.2627	6.5900e-003	61.6019
High Turnover (Sit Down Restaurant)	10.9272 / 0.697482	51.2702	0.3580	8.8200e-003	62.8482
Hotel	1.26834 / 0.140927	6.1633	0.0416	1.0300e-003	7.5079
Quality Restaurant	2.42827 / 0.154996	11.3934	0.0796	1.9600e-003	13.9663
Regional Shopping Center	4.14806 / 2.54236	27.5250	0.1363	3.4200e-003	31.9490
Total		**585.8052**	**3.0183**	**0.0755**	**683.7567**

8.0 Waste Detail

8.1 Mitigation Measures Waste

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	207.8079	12.2811	0.0000	514.8354
Unmitigated	207.8079	12.2811	0.0000	514.8354

8.2 Waste by Land Use

Unmitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Apartments Low Rise	11.5	2.3344	0.1380	0.0000	5.7834
Apartments Mid Rise	448.5	91.0415	5.3804	0.0000	225.5513
General Office Building	41.85	8.4952	0.5021	0.0000	21.0464
High Turnover (Sit Down Restaurant)	428.4	86.9613	5.1393	0.0000	215.4430
Hotel	27.38	5.5579	0.3285	0.0000	13.7694
Quality Restaurant	7.3	1.4818	0.0876	0.0000	3.6712
Regional Shopping Center	58.8	11.9359	0.7054	0.0000	29.5706
Total		**207.8079**	**12.2811**	**0.0000**	**514.8354**

8.2 Waste by Land Use

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Apartments Low Rise	11.5	2.3344	0.1380	0.0000	5.7834
Apartments Mid Rise	448.5	91.0415	5.3804	0.0000	225.5513
General Office Building	41.85	8.4952	0.5021	0.0000	21.0464
High Turnover (Sit Down Restaurant)	428.4	86.9613	5.1393	0.0000	215.4430
Hotel	27.38	5.5579	0.3285	0.0000	13.7694
Quality Restaurant	7.3	1.4818	0.0876	0.0000	3.6712
Regional Shopping Center	58.8	11.9359	0.7054	0.0000	29.5706
Total		**207.8079**	**12.2811**	**0.0000**	**514.8354**

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

Village South Specific Plan (Proposed)

Los Angeles-South Coast County, Summer

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
General Office Building	45.00	1000sqft	1.03	45,000.00	0
High Turnover (Sit Down Restaurant)	36.00	1000sqft	0.83	36,000.00	0
Hotel	50.00	Room	1.67	72,600.00	0
Quality Restaurant	8.00	1000sqft	0.18	8,000.00	0
Apartments Low Rise	25.00	Dwelling Unit	1.56	25,000.00	72
Apartments Mid Rise	975.00	Dwelling Unit	25.66	975,000.00	2789
Regional Shopping Center	56.00	1000sqft	1.29	56,000.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.2	**Precipitation Freq (Days)**	33
Climate Zone	9			**Operational Year**	2028
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	702.44	**CH4 Intensity (lb/MWhr)**	0.029	**N2O Intensity (lb/MWhr)**	0.006

1.3 User Entered Comments & Non-Default Data

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

Project Characteristics - Consistent with the DEIR's model.

Land Use - See SWAPE comment regarding residential and retail land uses.

Construction Phase - See SWAPE comment regarding individual construction phase lengths.

Demolition - Consistent with the DEIR's model. See SWAPE comment regarding demolition.

Vehicle Trips - Saturday trips consistent with the DEIR's model. See SWAPE comment regarding weekday and Sunday trips.

Woodstoves - Woodstoves and wood-burning fireplaces consistent with the DEIR's model. See SWAPE comment regarding gas fireplaces.

Energy Use -

Construction Off-road Equipment Mitigation - See SWAPE comment on construction-related mitigation.

Area Mitigation - See SWAPE comment regarding operational mitigation measures.

Water Mitigation - See SWAPE comment regarding operational mitigation measures.

Trips and VMT - Local hire provision

Table Name	Column Name	Default Value	New Value
tblFireplaces	FireplaceWoodMass	1,019.20	0.00
tblFireplaces	FireplaceWoodMass	1,019.20	0.00
tblFireplaces	NumberWood	1.25	0.00
tblFireplaces	NumberWood	48.75	0.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblVehicleTrips	ST_TR	7.16	6.17
tblVehicleTrips	ST_TR	6.39	3.87
tblVehicleTrips	ST_TR	2.46	1.39
tblVehicleTrips	ST_TR	158.37	79.82

tblVehicleTrips	ST_TR	8.19	3.75
tblVehicleTrips	ST_TR	94.36	63.99
tblVehicleTrips	ST_TR	49.97	10.74
tblVehicleTrips	SU_TR	6.07	6.16
tblVehicleTrips	SU_TR	5.86	4.18
tblVehicleTrips	SU_TR	1.05	0.69
tblVehicleTrips	SU_TR	131.84	78.27
tblVehicleTrips	SU_TR	5.95	3.20
tblVehicleTrips	SU_TR	72.16	57.65
tblVehicleTrips	SU_TR	25.24	6.39
tblVehicleTrips	WD_TR	6.59	5.83
tblVehicleTrips	WD_TR	6.65	4.13
tblVehicleTrips	WD_TR	11.03	6.41
tblVehicleTrips	WD_TR	127.15	65.80
tblVehicleTrips	WD_TR	8.17	3.84
tblVehicleTrips	WD_TR	89.95	62.64
tblVehicleTrips	WD_TR	42.70	9.43
tblWoodstoves	NumberCatalytic	1.25	0.00
tblWoodstoves	NumberCatalytic	48.75	0.00
tblWoodstoves	NumberNoncatalytic	1.25	0.00
tblWoodstoves	NumberNoncatalytic	48.75	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00

2.0 Emissions Summary

2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2021	4.2561	46.4415	31.4494	0.0636	18.2032	2.0456	20.2488	9.9670	1.8820	11.8490	0.0000	6,163.4166	6,163.4166	1.9475	0.0000	6,212.1039
2022	4.5441	38.8811	40.8776	0.1240	8.8255	1.6361	10.4616	3.6369	1.5052	5.1421	0.0000	12,493.4403	12,493.4403	1.9485	0.0000	12,518.5707
2023	4.1534	25.7658	38.7457	0.1206	7.0088	0.7592	7.7679	1.8799	0.7136	2.5935	0.0000	12,150.4890	12,150.4890	0.9589	0.0000	12,174.4615
2024	237.0219	9.5478	14.9642	0.0239	1.2171	0.4694	1.2875	0.3229	0.4319	0.4621	0.0000	2,313.1808	2,313.1808	0.7166	0.0000	2,331.0956
Maximum	**237.0219**	**46.4415**	**40.8776**	**0.1240**	**18.2032**	**2.0456**	**20.2488**	**9.9670**	**1.8820**	**11.8490**	**0.0000**	**12,493.4403**	**12,493.4403**	**1.9485**	**0.0000**	**12,518.5707**

2.1 Overall Construction (Maximum Daily Emission)

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2021	4.2561	46.4415	31.4494	0.0636	18.2032	2.0456	20.2488	9.9670	1.8820	11.8490	0.0000	6,163.4166	6,163.4166	1.9475	0.0000	6,212.1039
2022	4.5441	38.8811	40.8776	0.1240	8.8255	1.6361	10.4616	3.6369	1.5052	5.1421	0.0000	12,493.4403	12,493.4403	1.9485	0.0000	12,518.5707
2023	4.1534	25.7658	38.7457	0.1206	7.0088	0.7592	7.7679	1.8799	0.7136	2.5935	0.0000	12,150.4890	12,150.4890	0.9589	0.0000	12,174.4615
2024	237.0219	9.5478	14.9642	0.0239	1.2171	0.4694	1.2875	0.3229	0.4319	0.4621	0.0000	2,313.1808	2,313.1808	0.7166	0.0000	2,331.0955
Maximum	**237.0219**	**46.4415**	**40.8776**	**0.1240**	**18.2032**	**2.0456**	**20.2488**	**9.9670**	**1.8820**	**11.8490**	**0.0000**	**12,493.4403**	**12,493.4403**	**1.9485**	**0.0000**	**12,518.5707**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192
Energy	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387
Mobile	9.8489	45.4304	114.8495	0.4917	45.9592	0.3360	46.2951	12.2950	0.3119	12.6070		50,306.6034	50,306.6034	2.1807		50,361.1208
Total	**41.1168**	**67.2262**	**207.5497**	**0.6278**	**45.9592**	**2.4626**	**48.4217**	**12.2950**	**2.4385**	**14.7336**	**0.0000**	**76,811.1816**	**76,811.1816**	**2.8282**	**0.4832**	**77,025.8786**

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192
Energy	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387
Mobile	9.8489	45.4304	114.8495	0.4917	45.9592	0.3360	46.2951	12.2950	0.3119	12.6070		50,306.6034	50,306.6034	2.1807		50,361.1208
Total	**41.1168**	**67.2262**	**207.5497**	**0.6278**	**45.9592**	**2.4626**	**48.4217**	**12.2950**	**2.4385**	**14.7336**	**0.0000**	**76,811.1816**	**76,811.1816**	**2.8282**	**0.4832**	**77,025.8786**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	9/1/2021	10/12/2021	5	30	
2	Site Preparation	Site Preparation	10/13/2021	11/9/2021	5	20	
3	Grading	Grading	11/10/2021	1/11/2022	5	45	
4	Building Construction	Building Construction	1/12/2022	12/12/2023	5	500	
5	Paving	Paving	12/13/2023	1/30/2024	5	35	
6	Architectural Coating	Architectural Coating	1/31/2024	3/19/2024	5	35	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 112.5

Acres of Paving: 0

Residential Indoor: 2,025,000; Residential Outdoor: 675,000; Non-Residential Indoor: 326,400; Non-Residential Outdoor: 108,800; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Demolition	Excavators	3	8.00	158	0.38
Demolition	Rubber Tired Dozers	2	8.00	247	0.40
Site Preparation	Rubber Tired Dozers	3	8.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	4	8.00	97	0.37
Grading	Excavators	2	8.00	158	0.38
Grading	Graders	1	8.00	187	0.41
Grading	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Scrapers	2	8.00	367	0.48
Grading	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Building Construction	Cranes	1	7.00	231	0.29
Building Construction	Forklifts	3	8.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	3	7.00	97	0.37
Building Construction	Welders	1	8.00	46	0.45
Paving	Pavers	2	8.00	130	0.42
Paving	Paving Equipment	2	8.00	132	0.36
Paving	Rollers	2	8.00	80	0.38
Architectural Coating	Air Compressors	1	6.00	78	0.48

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	6	15.00	0.00	458.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	7	18.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	8	20.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	801.00	143.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	160.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Demolition - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					3.3074	0.0000	3.3074	0.5008	0.0000	0.5008			0.0000			0.0000
Off-Road	3.1651	31.4407	21.5650	0.0388		1.5513	1.5513		1.4411	1.4411		3,747.9449	3,747.9449	1.0549		3,774.3174
Total	**3.1651**	**31.4407**	**21.5650**	**0.0388**	**3.3074**	**1.5513**	**4.8588**	**0.5008**	**1.4411**	**1.9419**		**3,747.9449**	**3,747.9449**	**1.0549**		**3,774.3174**

3.2 Demolition - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.1273	4.0952	0.9602	0.0119	0.2669	0.0126	0.2795	0.0732	0.0120	0.0852		1,292.2413	1,292.2413	0.0877		1,294.4337
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0487	0.0313	0.4282	1.1800e-003	0.1141	9.5000e-004	0.1151	0.0303	8.8000e-004	0.0311		117.2799	117.2799	3.5200e-003		117.3678
Total	**0.1760**	**4.1265**	**1.3884**	**0.0131**	**0.3810**	**0.0135**	**0.3946**	**0.1034**	**0.0129**	**0.1163**		**1,409.5212**	**1,409.5212**	**0.0912**		**1,411.8015**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					3.3074	0.0000	3.3074	0.5008	0.0000	0.5008			0.0000			0.0000
Off-Road	3.1651	31.4407	21.5650	0.0388		1.5513	1.5513		1.4411	1.4411	0.0000	3,747.9449	3,747.9449	1.0549		3,774.3174
Total	**3.1651**	**31.4407**	**21.5650**	**0.0388**	**3.3074**	**1.5513**	**4.8588**	**0.5008**	**1.4411**	**1.9419**	**0.0000**	**3,747.9449**	**3,747.9449**	**1.0549**		**3,774.3174**

3.2 Demolition - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.1273	4.0952	0.9602	0.0119	0.2669	0.0126	0.2795	0.0732	0.0120	0.0852		1,292.2413	1,292.2413	0.0877		1,294.4337
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0487	0.0313	0.4282	1.1800e-003	0.1141	9.5000e-004	0.1151	0.0303	8.8000e-004	0.0311		117.2799	117.2799	3.5200e-003		117.3678
Total	**0.1760**	**4.1265**	**1.3884**	**0.0131**	**0.3810**	**0.0135**	**0.3946**	**0.1034**	**0.0129**	**0.1163**		**1,409.5212**	**1,409.5212**	**0.0912**		**1,411.8015**

3.3 Site Preparation - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					18.0663	0.0000	18.0663	9.9307	0.0000	9.9307			0.0000			0.0000
Off-Road	3.8882	40.4971	21.1543	0.0380		2.0445	2.0445		1.8809	1.8809		3,685.6569	3,685.6569	1.1920		3,715.4573
Total	**3.8882**	**40.4971**	**21.1543**	**0.0380**	**18.0663**	**2.0445**	**20.1107**	**9.9307**	**1.8809**	**11.8116**		**3,685.6569**	**3,685.6569**	**1.1920**		**3,715.4573**

3.3 Site Preparation - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0584	0.0375	0.5139	1.4100e-003	0.1369	1.1400e-003	0.1381	0.0363	1.0500e-003	0.0374		140.7359	140.7359	4.2200e-003		140.8414
Total	**0.0584**	**0.0375**	**0.5139**	**1.4100e-003**	**0.1369**	**1.1400e-003**	**0.1381**	**0.0363**	**1.0500e-003**	**0.0374**		**140.7359**	**140.7359**	**4.2200e-003**		**140.8414**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					18.0663	0.0000	18.0663	9.9307	0.0000	9.9307			0.0000			0.0000
Off-Road	3.8882	40.4971	21.1543	0.0380		2.0445	2.0445		1.8809	1.8809	0.0000	3,685.6569	3,685.6569	1.1920		3,715.4573
Total	**3.8882**	**40.4971**	**21.1543**	**0.0380**	**18.0663**	**2.0445**	**20.1107**	**9.9307**	**1.8809**	**11.8116**	**0.0000**	**3,685.6569**	**3,685.6569**	**1.1920**		**3,715.4573**

3.3 Site Preparation - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0584	0.0375	0.5139	1.4100e-003	0.1369	1.1400e-003	0.1381	0.0363	1.0500e-003	0.0374		140.7359	140.7359	4.2200e-003		140.8414
Total	**0.0584**	**0.0375**	**0.5139**	**1.4100e-003**	**0.1369**	**1.1400e-003**	**0.1381**	**0.0363**	**1.0500e-003**	**0.0374**		**140.7359**	**140.7359**	**4.2200e-003**		**140.8414**

3.4 Grading - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	4.1912	46.3998	30.8785	0.0620		1.9853	1.9853		1.8265	1.8265		6,007.0434	6,007.0434	1.9428		6,055.6134
Total	**4.1912**	**46.3998**	**30.8785**	**0.0620**	**8.6733**	**1.9853**	**10.6587**	**3.5965**	**1.8265**	**5.4230**		**6,007.0434**	**6,007.0434**	**1.9428**		**6,055.6134**

3.4 Grading - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0649	0.0417	0.5710	1.5700e-003	0.1521	1.2700e-003	0.1534	0.0404	1.1700e-003	0.0415		156.3732	156.3732	4.6900e-003		156.4904
Total	**0.0649**	**0.0417**	**0.5710**	**1.5700e-003**	**0.1521**	**1.2700e-003**	**0.1534**	**0.0404**	**1.1700e-003**	**0.0415**		**156.3732**	**156.3732**	**4.6900e-003**		**156.4904**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	4.1912	46.3998	30.8785	0.0620		1.9853	1.9853		1.8265	1.8265	0.0000	6,007.0434	6,007.0434	1.9428		6,055.6134
Total	**4.1912**	**46.3998**	**30.8785**	**0.0620**	**8.6733**	**1.9853**	**10.6587**	**3.5965**	**1.8265**	**5.4230**	**0.0000**	**6,007.0434**	**6,007.0434**	**1.9428**		**6,055.6134**

3.4 Grading - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0649	0.0417	0.5710	1.5700e-003	0.1521	1.2700e-003	0.1534	0.0404	1.1700e-003	0.0415		156.3732	156.3732	4.6900e-003		156.4904
Total	**0.0649**	**0.0417**	**0.5710**	**1.5700e-003**	**0.1521**	**1.2700e-003**	**0.1534**	**0.0404**	**1.1700e-003**	**0.0415**		**156.3732**	**156.3732**	**4.6900e-003**		**156.4904**

3.4 Grading - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	3.6248	38.8435	29.0415	0.0621		1.6349	1.6349		1.5041	1.5041		6,011.4105	6,011.4105	1.9442		6,060.0158
Total	**3.6248**	**38.8435**	**29.0415**	**0.0621**	**8.6733**	**1.6349**	**10.3082**	**3.5965**	**1.5041**	**5.1006**		**6,011.4105**	**6,011.4105**	**1.9442**		**6,060.0158**

3.4 Grading - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0607	0.0376	0.5263	1.5100e-003	0.1521	1.2300e-003	0.1534	0.0404	1.1300e-003	0.0415		150.8754	150.8754	4.2400e-003		150.9813
Total	**0.0607**	**0.0376**	**0.5263**	**1.5100e-003**	**0.1521**	**1.2300e-003**	**0.1534**	**0.0404**	**1.1300e-003**	**0.0415**		**150.8754**	**150.8754**	**4.2400e-003**		**150.9813**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	3.6248	38.8435	29.0415	0.0621		1.6349	1.6349		1.5041	1.5041	0.0000	6,011.4105	6,011.4105	1.9442		6,060.0158
Total	**3.6248**	**38.8435**	**29.0415**	**0.0621**	**8.6733**	**1.6349**	**10.3082**	**3.5965**	**1.5041**	**5.1006**	**0.0000**	**6,011.4105**	**6,011.4105**	**1.9442**		**6,060.0158**

3.4 Grading - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0607	0.0376	0.5263	1.5100e-003	0.1521	1.2300e-003	0.1534	0.0404	1.1300e-003	0.0415		150.8754	150.8754	4.2400e-003		150.9813
Total	**0.0607**	**0.0376**	**0.5263**	**1.5100e-003**	**0.1521**	**1.2300e-003**	**0.1534**	**0.0404**	**1.1300e-003**	**0.0415**		**150.8754**	**150.8754**	**4.2400e-003**		**150.9813**

3.5 Building Construction - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.7062	15.6156	16.3634	0.0269		0.8090	0.8090		0.7612	0.7612		2,554.3336	2,554.3336	0.6120		2,569.6322
Total	**1.7062**	**15.6156**	**16.3634**	**0.0269**		**0.8090**	**0.8090**		**0.7612**	**0.7612**		**2,554.3336**	**2,554.3336**	**0.6120**		**2,569.6322**

3.5 Building Construction - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.4079	13.2032	3.4341	0.0364	0.9155	0.0248	0.9404	0.2636	0.0237	0.2873		3,896.5482	3,896.5482	0.2236		3,902.1384
Worker	2.4299	1.5074	21.0801	0.0607	6.0932	0.0493	6.1425	1.6163	0.0454	1.6617		6,042.5585	6,042.5585	0.1697		6,046.8000
Total	**2.8378**	**14.7106**	**24.5142**	**0.0971**	**7.0087**	**0.0741**	**7.0828**	**1.8799**	**0.0691**	**1.9490**		**9,939.1067**	**9,939.1067**	**0.3933**		**9,948.9384**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.7062	15.6156	16.3634	0.0269		0.8090	0.8090		0.7612	0.7612	0.0000	2,554.3336	2,554.3336	0.6120		2,569.6322
Total	**1.7062**	**15.6156**	**16.3634**	**0.0269**		**0.8090**	**0.8090**		**0.7612**	**0.7612**	**0.0000**	**2,554.3336**	**2,554.3336**	**0.6120**		**2,569.6322**

3.5 Building Construction - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.4079	13.2032	3.4341	0.0364	0.9155	0.0248	0.9404	0.2636	0.0237	0.2873		3,896.5482	3,896.5482	0.2236		3,902.1384
Worker	2.4299	1.5074	21.0801	0.0607	6.0932	0.0493	6.1425	1.6163	0.0454	1.6617		6,042.5585	6,042.5585	0.1697		6,046.8000
Total	**2.8378**	**14.7106**	**24.5142**	**0.0971**	**7.0087**	**0.0741**	**7.0828**	**1.8799**	**0.0691**	**1.9490**		**9,939.1067**	**9,939.1067**	**0.3933**		**9,948.9384**

3.5 Building Construction - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.5728	14.3849	16.2440	0.0269		0.6997	0.6997		0.6584	0.6584		2,555.2099	2,555.2099	0.6079		2,570.4061
Total	**1.5728**	**14.3849**	**16.2440**	**0.0269**		**0.6997**	**0.6997**		**0.6584**	**0.6584**		**2,555.2099**	**2,555.2099**	**0.6079**		**2,570.4061**

3.5 Building Construction - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.3027	10.0181	3.1014	0.0352	0.9156	0.0116	0.9271	0.2636	0.0111	0.2747		3,773.8762	3,773.8762	0.1982		3,778.8300
Worker	2.2780	1.3628	19.4002	0.0584	6.0932	0.0479	6.1411	1.6163	0.0441	1.6604		5,821.4028	5,821.4028	0.1529		5,825.2254
Total	**2.5807**	**11.3809**	**22.5017**	**0.0936**	**7.0088**	**0.0595**	**7.0682**	**1.8799**	**0.0552**	**1.9350**		**9,595.2790**	**9,595.2790**	**0.3511**		**9,604.0554**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.5728	14.3849	16.2440	0.0269		0.6997	0.6997		0.6584	0.6584	0.0000	2,555.2099	2,555.2099	0.6079		2,570.4061
Total	**1.5728**	**14.3849**	**16.2440**	**0.0269**		**0.6997**	**0.6997**		**0.6584**	**0.6584**	**0.0000**	**2,555.2099**	**2,555.2099**	**0.6079**		**2,570.4061**

3.5 Building Construction - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.3027	10.0181	3.1014	0.0352	0.9156	0.0116	0.9271	0.2636	0.0111	0.2747		3,773.8762	3,773.8762	0.1982		3,778.8300
Worker	2.2780	1.3628	19.4002	0.0584	6.0932	0.0479	6.1411	1.6163	0.0441	1.6604		5,821.4028	5,821.4028	0.1529		5,825.2254
Total	**2.5807**	**11.3809**	**22.5017**	**0.0936**	**7.0088**	**0.0595**	**7.0682**	**1.8799**	**0.0552**	**1.9350**		**9,595.2790**	**9,595.2790**	**0.3511**		**9,604.0554**

3.6 Paving - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.0327	10.1917	14.5842	0.0228		0.5102	0.5102		0.4694	0.4694		2,207.5841	2,207.5841	0.7140		2,225.4336
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**1.0327**	**10.1917**	**14.5842**	**0.0228**		**0.5102**	**0.5102**		**0.4694**	**0.4694**		**2,207.5841**	**2,207.5841**	**0.7140**		**2,225.4336**

3.6 Paving - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0427	0.0255	0.3633	1.0900e-003	0.1141	9.0000e-004	0.1150	0.0303	8.3000e-004	0.0311		109.0150	109.0150	2.8600e-003		109.0866
Total	**0.0427**	**0.0255**	**0.3633**	**1.0900e-003**	**0.1141**	**9.0000e-004**	**0.1150**	**0.0303**	**8.3000e-004**	**0.0311**		**109.0150**	**109.0150**	**2.8600e-003**		**109.0866**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.0327	10.1917	14.5842	0.0228		0.5102	0.5102		0.4694	0.4694	0.0000	2,207.5841	2,207.5841	0.7140		2,225.4336
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**1.0327**	**10.1917**	**14.5842**	**0.0228**		**0.5102**	**0.5102**		**0.4694**	**0.4694**	**0.0000**	**2,207.5841**	**2,207.5841**	**0.7140**		**2,225.4336**

3.6 Paving - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0427	0.0255	0.3633	1.0900e-003	0.1141	9.0000e-004	0.1150	0.0303	8.3000e-004	0.0311		109.0150	109.0150	2.8600e-003		109.0866
Total	**0.0427**	**0.0255**	**0.3633**	**1.0900e-003**	**0.1141**	**9.0000e-004**	**0.1150**	**0.0303**	**8.3000e-004**	**0.0311**		**109.0150**	**109.0150**	**2.8600e-003**		**109.0866**

3.6 Paving - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.9882	9.5246	14.6258	0.0228		0.4685	0.4685		0.4310	0.4310		2,207.5472	2,207.5472	0.7140		2,225.3963
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**0.9882**	**9.5246**	**14.6258**	**0.0228**		**0.4685**	**0.4685**		**0.4310**	**0.4310**		**2,207.5472**	**2,207.5472**	**0.7140**		**2,225.3963**

3.6 Paving - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0403	0.0233	0.3384	1.0600e-003	0.1141	8.8000e-004	0.1150	0.0303	8.1000e-004	0.0311		105.6336	105.6336	2.6300e-003		105.6992
Total	**0.0403**	**0.0233**	**0.3384**	**1.0600e-003**	**0.1141**	**8.8000e-004**	**0.1150**	**0.0303**	**8.1000e-004**	**0.0311**		**105.6336**	**105.6336**	**2.6300e-003**		**105.6992**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.9882	9.5246	14.6258	0.0228		0.4685	0.4685		0.4310	0.4310	0.0000	2,207.5472	2,207.5472	0.7140		2,225.3963
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**0.9882**	**9.5246**	**14.6258**	**0.0228**		**0.4685**	**0.4685**		**0.4310**	**0.4310**	**0.0000**	**2,207.5472**	**2,207.5472**	**0.7140**		**2,225.3963**

3.6 Paving - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0403	0.0233	0.3384	1.0600e-003	0.1141	8.8000e-004	0.1150	0.0303	8.1000e-004	0.0311		105.6336	105.6336	2.6300e-003		105.6992
Total	**0.0403**	**0.0233**	**0.3384**	**1.0600e-003**	**0.1141**	**8.8000e-004**	**0.1150**	**0.0303**	**8.1000e-004**	**0.0311**		**105.6336**	**105.6336**	**2.6300e-003**		**105.6992**

3.7 Architectural Coating - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	236.4115					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1808	1.2188	1.8101	2.9700e-003		0.0609	0.0609		0.0609	0.0609		281.4481	281.4481	0.0159		281.8443
Total	**236.5923**	**1.2188**	**1.8101**	**2.9700e-003**		**0.0609**	**0.0609**		**0.0609**	**0.0609**		**281.4481**	**281.4481**	**0.0159**		**281.8443**

3.7 Architectural Coating - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.4296	0.2481	3.6098	0.0113	1.2171	9.4300e-003	1.2266	0.3229	8.6800e-003	0.3315		1,126.7583	1,126.7583	0.0280		1,127.4583
Total	**0.4296**	**0.2481**	**3.6098**	**0.0113**	**1.2171**	**9.4300e-003**	**1.2266**	**0.3229**	**8.6800e-003**	**0.3315**		**1,126.7583**	**1,126.7583**	**0.0280**		**1,127.4583**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	236.4115					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1808	1.2188	1.8101	2.9700e-003		0.0609	0.0609		0.0609	0.0609	0.0000	281.4481	281.4481	0.0159		281.8443
Total	**236.5923**	**1.2188**	**1.8101**	**2.9700e-003**		**0.0609**	**0.0609**		**0.0609**	**0.0609**	**0.0000**	**281.4481**	**281.4481**	**0.0159**		**281.8443**

3.7 Architectural Coating - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.4296	0.2481	3.6098	0.0113	1.2171	9.4300e-003	1.2266	0.3229	8.6800e-003	0.3315		1,126.7583	1,126.7583	0.0280		1,127.4583
Total	**0.4296**	**0.2481**	**3.6098**	**0.0113**	**1.2171**	**9.4300e-003**	**1.2266**	**0.3229**	**8.6800e-003**	**0.3315**		**1,126.7583**	**1,126.7583**	**0.0280**		**1,127.4583**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	9.8489	45.4304	114.8495	0.4917	45.9592	0.3360	46.2951	12.2950	0.3119	12.6070		50,306.6034	50,306.6034	2.1807		50,361.1208
Unmitigated	9.8489	45.4304	114.8495	0.4917	45.9592	0.3360	46.2951	12.2950	0.3119	12.6070		50,306.6034	50,306.6034	2.1807		50,361.1208

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Apartments Low Rise	145.75	154.25	154.00	506,227	506,227
Apartments Mid Rise	4,026.75	3,773.25	4075.50	13,660,065	13,660,065
General Office Building	288.45	62.55	31.05	706,812	706,812
High Turnover (Sit Down Restaurant)	2,368.80	2,873.52	2817.72	3,413,937	3,413,937
Hotel	192.00	187.50	160.00	445,703	445,703
Quality Restaurant	501.12	511.92	461.20	707,488	707,488
Regional Shopping Center	528.08	601.44	357.84	1,112,221	1,112,221
Total	8,050.95	8,164.43	8,057.31	20,552,452	20,552,452

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Apartments Low Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3
Apartments Mid Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3
General Office Building	16.60	8.40	6.90	33.00	48.00	19.00	77	19	4
High Turnover (Sit Down	16.60	8.40	6.90	8.50	72.50	19.00	37	20	43
Hotel	16.60	8.40	6.90	19.40	61.60	19.00	58	38	4
Quality Restaurant	16.60	8.40	6.90	12.00	69.00	19.00	38	18	44
Regional Shopping Center	16.60	8.40	6.90	16.30	64.70	19.00	54	35	11

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Apartments Low Rise	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Apartments Mid Rise	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
General Office Building	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
High Turnover (Sit Down Restaurant)	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Hotel	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Quality Restaurant	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Regional Shopping Center	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387
NaturalGas Unmitigated	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Apartments Low Rise	1119.16	0.0121	0.1031	0.0439	6.6000e-004		8.3400e-003	8.3400e-003		8.3400e-003	8.3400e-003		131.6662	131.6662	2.5200e-003	2.4100e-003	132.4486
Apartments Mid Rise	35784.3	0.3859	3.2978	1.4033	0.0211		0.2666	0.2666		0.2666	0.2666		4,209.9164	4,209.9164	0.0807	0.0772	4,234.9339
General Office Building	1283.42	0.0138	0.1258	0.1057	7.5000e-004		9.5600e-003	9.5600e-003		9.5600e-003	9.5600e-003		150.9911	150.9911	2.8900e-003	2.7700e-003	151.8884
High Turnover (Sit Down Restaurant)	22759.9	0.2455	2.2314	1.8743	0.0134		0.1696	0.1696		0.1696	0.1696		2,677.6342	2,677.6342	0.0513	0.0491	2,693.5460
Hotel	4769.72	0.0514	0.4676	0.3928	2.8100e-003		0.0355	0.0355		0.0355	0.0355		561.1436	561.1436	0.0108	0.0103	564.4782
Quality Restaurant	5057.75	0.0545	0.4959	0.4165	2.9800e-003		0.0377	0.0377		0.0377	0.0377		595.0298	595.0298	0.0114	0.0109	598.5658
Regional Shopping Center	251.616	2.7100e-003	0.0247	0.0207	1.5000e-004		1.8700e-003	1.8700e-003		1.8700e-003	1.8700e-003		29.6019	29.6019	5.7000e-004	5.4000e-004	29.7778
Total		**0.7660**	**6.7463**	**4.2573**	**0.0418**		**0.5292**	**0.5292**		**0.5292**	**0.5292**		**8,355.9832**	**8,355.9832**	**0.1602**	**0.1532**	**8,405.6387**

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Apartments Low Rise	1.11916	0.0121	0.1031	0.0439	6.6000e-004		8.3400e-003	8.3400e-003		8.3400e-003	8.3400e-003		131.6662	131.6662	2.5200e-003	2.4100e-003	132.4486
Apartments Mid Rise	35.7843	0.3859	3.2978	1.4033	0.0211		0.2666	0.2666		0.2666	0.2666		4,209.9164	4,209.9164	0.0807	0.0772	4,234.9339
General Office Building	1.28342	0.0138	0.1258	0.1057	7.5000e-004		9.5600e-003	9.5600e-003		9.5600e-003	9.5600e-003		150.9911	150.9911	2.8900e-003	2.7700e-003	151.8884
High Turnover (Sit Down Restaurant)	22.7599	0.2455	2.2314	1.8743	0.0134		0.1696	0.1696		0.1696	0.1696		2,677.6342	2,677.6342	0.0513	0.0491	2,693.5460
Hotel	4.76972	0.0514	0.4676	0.3928	2.8100e-003		0.0355	0.0355		0.0355	0.0355		561.1436	561.1436	0.0108	0.0103	564.4782
Quality Restaurant	5.05775	0.0545	0.4959	0.4165	2.9800e-003		0.0377	0.0377		0.0377	0.0377		595.0298	595.0298	0.0114	0.0109	598.5658
Regional Shopping Center	0.251616	2.7100e-003	0.0247	0.0207	1.5000e-004		1.8700e-003	1.8700e-003		1.8700e-003	1.8700e-003		29.6019	29.6019	5.7000e-004	5.4000e-004	29.7778
Total		**0.7660**	**6.7463**	**4.2573**	**0.0418**		**0.5292**	**0.5292**		**0.5292**	**0.5292**		**8,355.9832**	**8,355.9832**	**0.1602**	**0.1532**	**8,405.6387**

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192
Unmitigated	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	2.2670					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	24.1085					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	1.6500	14.1000	6.0000	0.0900		1.1400	1.1400		1.1400	1.1400	0.0000	18,000.0000	18,000.0000	0.3450	0.3300	18,106.9650
Landscaping	2.4766	0.9496	82.4430	4.3600e-003		0.4574	0.4574		0.4574	0.4574		148.5950	148.5950	0.1424		152.1542
Total	**30.5020**	**15.0496**	**88.4430**	**0.0944**		**1.5974**	**1.5974**		**1.5974**	**1.5974**	**0.0000**	**18,148.5950**	**18,148.5950**	**0.4874**	**0.3300**	**18,259.1192**

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	2.2670					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	24.1085					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	1.6500	14.1000	6.0000	0.0900		1.1400	1.1400		1.1400	1.1400	0.0000	18,000.0000	18,000.0000	0.3450	0.3300	18,106.9650
Landscaping	2.4766	0.9496	82.4430	4.3600e-003		0.4574	0.4574		0.4574	0.4574		148.5950	148.5950	0.1424		152.1542
Total	**30.5020**	**15.0496**	**88.4430**	**0.0944**		**1.5974**	**1.5974**		**1.5974**	**1.5974**	**0.0000**	**18,148.5950**	**18,148.5950**	**0.4874**	**0.3300**	**18,259.1192**

7.0 Water Detail

7.1 Mitigation Measures Water

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

Village South Specific Plan (Proposed)

Los Angeles-South Coast County, Winter

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
General Office Building	45.00	1000sqft	1.03	45,000.00	0
High Turnover (Sit Down Restaurant)	36.00	1000sqft	0.83	36,000.00	0
Hotel	50.00	Room	1.67	72,600.00	0
Quality Restaurant	8.00	1000sqft	0.18	8,000.00	0
Apartments Low Rise	25.00	Dwelling Unit	1.56	25,000.00	72
Apartments Mid Rise	975.00	Dwelling Unit	25.66	975,000.00	2789
Regional Shopping Center	56.00	1000sqft	1.29	56,000.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.2	**Precipitation Freq (Days)**	33
Climate Zone	9			**Operational Year**	2028
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	702.44	**CH4 Intensity (lb/MWhr)**	0.029	**N2O Intensity (lb/MWhr)**	0.006

1.3 User Entered Comments & Non-Default Data

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

Project Characteristics - Consistent with the DEIR's model.

Land Use - See SWAPE comment regarding residential and retail land uses.

Construction Phase - See SWAPE comment regarding individual construction phase lengths.

Demolition - Consistent with the DEIR's model. See SWAPE comment regarding demolition.

Vehicle Trips - Saturday trips consistent with the DEIR's model. See SWAPE comment regarding weekday and Sunday trips.

Woodstoves - Woodstoves and wood-burning fireplaces consistent with the DEIR's model. See SWAPE comment regarding gas fireplaces.

Energy Use -

Construction Off-road Equipment Mitigation - See SWAPE comment on construction-related mitigation.

Area Mitigation - See SWAPE comment regarding operational mitigation measures.

Water Mitigation - See SWAPE comment regarding operational mitigation measures.

Trips and VMT - Local hire provision

Table Name	Column Name	Default Value	New Value
tblFireplaces	FireplaceWoodMass	1,019.20	0.00
tblFireplaces	FireplaceWoodMass	1,019.20	0.00
tblFireplaces	NumberWood	1.25	0.00
tblFireplaces	NumberWood	48.75	0.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblVehicleTrips	ST_TR	7.16	6.17
tblVehicleTrips	ST_TR	6.39	3.87
tblVehicleTrips	ST_TR	2.46	1.39
tblVehicleTrips	ST_TR	158.37	79.82

tblVehicleTrips	ST_TR	8.19	3.75
tblVehicleTrips	ST_TR	94.36	63.99
tblVehicleTrips	ST_TR	49.97	10.74
tblVehicleTrips	SU_TR	6.07	6.16
tblVehicleTrips	SU_TR	5.86	4.18
tblVehicleTrips	SU_TR	1.05	0.69
tblVehicleTrips	SU_TR	131.84	78.27
tblVehicleTrips	SU_TR	5.95	3.20
tblVehicleTrips	SU_TR	72.16	57.65
tblVehicleTrips	SU_TR	25.24	6.39
tblVehicleTrips	WD_TR	6.59	5.83
tblVehicleTrips	WD_TR	6.65	4.13
tblVehicleTrips	WD_TR	11.03	6.41
tblVehicleTrips	WD_TR	127.15	65.80
tblVehicleTrips	WD_TR	8.17	3.84
tblVehicleTrips	WD_TR	89.95	62.64
tblVehicleTrips	WD_TR	42.70	9.43
tblWoodstoves	NumberCatalytic	1.25	0.00
tblWoodstoves	NumberCatalytic	48.75	0.00
tblWoodstoves	NumberNoncatalytic	1.25	0.00
tblWoodstoves	NumberNoncatalytic	48.75	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00

2.0 Emissions Summary

2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2021	4.2621	46.4460	31.4068	0.0635	18.2032	2.0456	20.2488	9.9670	1.8820	11.8490	0.0000	6,154.3377	6,154.3377	1.9472	0.0000	6,203.0186
2022	4.7966	38.8851	39.6338	0.1195	8.8255	1.6361	10.4616	3.6369	1.5052	5.1421	0.0000	12,035.3440	12,035.3440	1.9482	0.0000	12,060.6013
2023	4.3939	25.8648	37.5031	0.1162	7.0088	0.7598	7.7685	1.8799	0.7142	2.5940	0.0000	11,710.4080	11,710.4080	0.9617	0.0000	11,734.4497
2024	237.0656	9.5503	14.9372	0.0238	1.2171	0.4694	1.2875	0.3229	0.4319	0.4621	0.0000	2,307.0517	2,307.0517	0.7164	0.0000	2,324.9627
Maximum	**237.0656**	**46.4460**	**39.6338**	**0.1195**	**18.2032**	**2.0456**	**20.2488**	**9.9670**	**1.8820**	**11.8490**	**0.0000**	**12,035.3440**	**12,035.3440**	**1.9482**	**0.0000**	**12,060.6013**

2.1 Overall Construction (Maximum Daily Emission)

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2021	4.2621	46.4460	31.4068	0.0635	18.2032	2.0456	20.2488	9.9670	1.8820	11.8490	0.0000	6,154.3377	6,154.3377	1.9472	0.0000	6,203.0186
2022	4.7966	38.8851	39.6338	0.1195	8.8255	1.6361	10.4616	3.6369	1.5052	5.1421	0.0000	12,035.3440	12,035.3440	1.9482	0.0000	12,060.6013
2023	4.3939	25.8648	37.5031	0.1162	7.0088	0.7598	7.7685	1.8799	0.7142	2.5940	0.0000	11,710.4080	11,710.4080	0.9617	0.0000	11,734.4497
2024	237.0656	9.5503	14.9372	0.0238	1.2171	0.4694	1.2875	0.3229	0.4319	0.4621	0.0000	2,307.0517	2,307.0517	0.7164	0.0000	2,324.9627
Maximum	**237.0656**	**46.4460**	**39.6338**	**0.1195**	**18.2032**	**2.0456**	**20.2488**	**9.9670**	**1.8820**	**11.8490**	**0.0000**	**12,035.3440**	**12,035.3440**	**1.9482**	**0.0000**	**12,060.6013**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192
Energy	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387
Mobile	9.5233	45.9914	110.0422	0.4681	45.9592	0.3373	46.2965	12.2950	0.3132	12.6083		47,917.8005	47,917.8005	2.1953		47,972.6839
Total	**40.7912**	**67.7872**	**202.7424**	**0.6043**	**45.9592**	**2.4640**	**48.4231**	**12.2950**	**2.4399**	**14.7349**	**0.0000**	**74,422.3787**	**74,422.3787**	**2.8429**	**0.4832**	**74,637.4417**

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192
Energy	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387
Mobile	9.5233	45.9914	110.0422	0.4681	45.9592	0.3373	46.2965	12.2950	0.3132	12.6083		47,917.8005	47,917.8005	2.1953		47,972.6839
Total	**40.7912**	**67.7872**	**202.7424**	**0.6043**	**45.9592**	**2.4640**	**48.4231**	**12.2950**	**2.4399**	**14.7349**	**0.0000**	**74,422.3787**	**74,422.3787**	**2.8429**	**0.4832**	**74,637.4417**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	9/1/2021	10/12/2021	5	30	
2	Site Preparation	Site Preparation	10/13/2021	11/9/2021	5	20	
3	Grading	Grading	11/10/2021	1/11/2022	5	45	
4	Building Construction	Building Construction	1/12/2022	12/12/2023	5	500	
5	Paving	Paving	12/13/2023	1/30/2024	5	35	
6	Architectural Coating	Architectural Coating	1/31/2024	3/19/2024	5	35	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 112.5

Acres of Paving: 0

Residential Indoor: 2,025,000; Residential Outdoor: 675,000; Non-Residential Indoor: 326,400; Non-Residential Outdoor: 108,800; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Demolition	Excavators	3	8.00	158	0.38
Demolition	Rubber Tired Dozers	2	8.00	247	0.40
Site Preparation	Rubber Tired Dozers	3	8.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	4	8.00	97	0.37
Grading	Excavators	2	8.00	158	0.38
Grading	Graders	1	8.00	187	0.41
Grading	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Scrapers	2	8.00	367	0.48
Grading	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Building Construction	Cranes	1	7.00	231	0.29
Building Construction	Forklifts	3	8.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	3	7.00	97	0.37
Building Construction	Welders	1	8.00	46	0.45
Paving	Pavers	2	8.00	130	0.42
Paving	Paving Equipment	2	8.00	132	0.36
Paving	Rollers	2	8.00	80	0.38
Architectural Coating	Air Compressors	1	6.00	78	0.48

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	6	15.00	0.00	458.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	7	18.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	8	20.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	801.00	143.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	160.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Demolition - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					3.3074	0.0000	3.3074	0.5008	0.0000	0.5008			0.0000			0.0000
Off-Road	3.1651	31.4407	21.5650	0.0388		1.5513	1.5513		1.4411	1.4411		3,747.9449	3,747.9449	1.0549		3,774.3174
Total	**3.1651**	**31.4407**	**21.5650**	**0.0388**	**3.3074**	**1.5513**	**4.8588**	**0.5008**	**1.4411**	**1.9419**		**3,747.9449**	**3,747.9449**	**1.0549**		**3,774.3174**

3.2 Demolition - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.1304	4.1454	1.0182	0.0117	0.2669	0.0128	0.2797	0.0732	0.0122	0.0854		1,269.8555	1,269.8555	0.0908		1,272.1252
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0532	0.0346	0.3963	1.1100e-003	0.1141	9.5000e-004	0.1151	0.0303	8.8000e-004	0.0311		110.4707	110.4707	3.3300e-003		110.5539
Total	**0.1835**	**4.1800**	**1.4144**	**0.0128**	**0.3810**	**0.0137**	**0.3948**	**0.1034**	**0.0131**	**0.1165**		**1,380.3262**	**1,380.3262**	**0.0941**		**1,382.6791**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					3.3074	0.0000	3.3074	0.5008	0.0000	0.5008			0.0000			0.0000
Off-Road	3.1651	31.4407	21.5650	0.0388		1.5513	1.5513		1.4411	1.4411	0.0000	3,747.9449	3,747.9449	1.0549		3,774.3174
Total	**3.1651**	**31.4407**	**21.5650**	**0.0388**	**3.3074**	**1.5513**	**4.8588**	**0.5008**	**1.4411**	**1.9419**	**0.0000**	**3,747.9449**	**3,747.9449**	**1.0549**		**3,774.3174**

3.2 Demolition - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.1304	4.1454	1.0182	0.0117	0.2669	0.0128	0.2797	0.0732	0.0122	0.0854		1,269.8555	1,269.8555	0.0908		1,272.1252
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0532	0.0346	0.3963	1.1100e-003	0.1141	9.5000e-004	0.1151	0.0303	8.8000e-004	0.0311		110.4707	110.4707	3.3300e-003		110.5539
Total	**0.1835**	**4.1800**	**1.4144**	**0.0128**	**0.3810**	**0.0137**	**0.3948**	**0.1034**	**0.0131**	**0.1165**		**1,380.3262**	**1,380.3262**	**0.0941**		**1,382.6791**

3.3 Site Preparation - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					18.0663	0.0000	18.0663	9.9307	0.0000	9.9307			0.0000			0.0000
Off-Road	3.8882	40.4971	21.1543	0.0380		2.0445	2.0445		1.8809	1.8809		3,685.6569	3,685.6569	1.1920		3,715.4573
Total	**3.8882**	**40.4971**	**21.1543**	**0.0380**	**18.0663**	**2.0445**	**20.1107**	**9.9307**	**1.8809**	**11.8116**		**3,685.6569**	**3,685.6569**	**1.1920**		**3,715.4573**

3.3 Site Preparation - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0638	0.0415	0.4755	1.3300e-003	0.1369	1.1400e-003	0.1381	0.0363	1.0500e-003	0.0374		132.5649	132.5649	3.9900e-003		132.6646
Total	**0.0638**	**0.0415**	**0.4755**	**1.3300e-003**	**0.1369**	**1.1400e-003**	**0.1381**	**0.0363**	**1.0500e-003**	**0.0374**		**132.5649**	**132.5649**	**3.9900e-003**		**132.6646**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					18.0663	0.0000	18.0663	9.9307	0.0000	9.9307			0.0000			0.0000
Off-Road	3.8882	40.4971	21.1543	0.0380		2.0445	2.0445		1.8809	1.8809	0.0000	3,685.6569	3,685.6569	1.1920		3,715.4573
Total	**3.8882**	**40.4971**	**21.1543**	**0.0380**	**18.0663**	**2.0445**	**20.1107**	**9.9307**	**1.8809**	**11.8116**	**0.0000**	**3,685.6569**	**3,685.6569**	**1.1920**		**3,715.4573**

3.3 Site Preparation - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0638	0.0415	0.4755	1.3300e-003	0.1369	1.1400e-003	0.1381	0.0363	1.0500e-003	0.0374		132.5649	132.5649	3.9900e-003		132.6646
Total	**0.0638**	**0.0415**	**0.4755**	**1.3300e-003**	**0.1369**	**1.1400e-003**	**0.1381**	**0.0363**	**1.0500e-003**	**0.0374**		**132.5649**	**132.5649**	**3.9900e-003**		**132.6646**

3.4 Grading - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	4.1912	46.3998	30.8785	0.0620		1.9853	1.9853		1.8265	1.8265		6,007.0434	6,007.0434	1.9428		6,055.6134
Total	**4.1912**	**46.3998**	**30.8785**	**0.0620**	**8.6733**	**1.9853**	**10.6587**	**3.5965**	**1.8265**	**5.4230**		**6,007.0434**	**6,007.0434**	**1.9428**		**6,055.6134**

3.4 Grading - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0709	0.0462	0.5284	1.4800e-003	0.1521	1.2700e-003	0.1534	0.0404	1.1700e-003	0.0415		147.2943	147.2943	4.4300e-003		147.4051
Total	**0.0709**	**0.0462**	**0.5284**	**1.4800e-003**	**0.1521**	**1.2700e-003**	**0.1534**	**0.0404**	**1.1700e-003**	**0.0415**		**147.2943**	**147.2943**	**4.4300e-003**		**147.4051**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	4.1912	46.3998	30.8785	0.0620		1.9853	1.9853		1.8265	1.8265	0.0000	6,007.0434	6,007.0434	1.9428		6,055.6134
Total	**4.1912**	**46.3998**	**30.8785**	**0.0620**	**8.6733**	**1.9853**	**10.6587**	**3.5965**	**1.8265**	**5.4230**	**0.0000**	**6,007.0434**	**6,007.0434**	**1.9428**		**6,055.6134**

3.4 Grading - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0709	0.0462	0.5284	1.4800e-003	0.1521	1.2700e-003	0.1534	0.0404	1.1700e-003	0.0415		147.2943	147.2943	4.4300e-003		147.4051
Total	**0.0709**	**0.0462**	**0.5284**	**1.4800e-003**	**0.1521**	**1.2700e-003**	**0.1534**	**0.0404**	**1.1700e-003**	**0.0415**		**147.2943**	**147.2943**	**4.4300e-003**		**147.4051**

3.4 Grading - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	3.6248	38.8435	29.0415	0.0621		1.6349	1.6349		1.5041	1.5041		6,011.4105	6,011.4105	1.9442		6,060.0158
Total	**3.6248**	**38.8435**	**29.0415**	**0.0621**	**8.6733**	**1.6349**	**10.3082**	**3.5965**	**1.5041**	**5.1006**		**6,011.4105**	**6,011.4105**	**1.9442**		**6,060.0158**

3.4 Grading - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0665	0.0416	0.4861	1.4300e-003	0.1521	1.2300e-003	0.1534	0.0404	1.1300e-003	0.0415		142.1207	142.1207	4.0000e-003		142.2207
Total	**0.0665**	**0.0416**	**0.4861**	**1.4300e-003**	**0.1521**	**1.2300e-003**	**0.1534**	**0.0404**	**1.1300e-003**	**0.0415**		**142.1207**	**142.1207**	**4.0000e-003**		**142.2207**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	3.6248	38.8435	29.0415	0.0621		1.6349	1.6349		1.5041	1.5041	0.0000	6,011.4105	6,011.4105	1.9442		6,060.0158
Total	**3.6248**	**38.8435**	**29.0415**	**0.0621**	**8.6733**	**1.6349**	**10.3082**	**3.5965**	**1.5041**	**5.1006**	**0.0000**	**6,011.4105**	**6,011.4105**	**1.9442**		**6,060.0158**

3.4 Grading - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0665	0.0416	0.4861	1.4300e-003	0.1521	1.2300e-003	0.1534	0.0404	1.1300e-003	0.0415		142.1207	142.1207	4.0000e-003		142.2207
Total	**0.0665**	**0.0416**	**0.4861**	**1.4300e-003**	**0.1521**	**1.2300e-003**	**0.1534**	**0.0404**	**1.1300e-003**	**0.0415**		**142.1207**	**142.1207**	**4.0000e-003**		**142.2207**

3.5 Building Construction - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.7062	15.6156	16.3634	0.0269		0.8090	0.8090		0.7612	0.7612		2,554.3336	2,554.3336	0.6120		2,569.6322
Total	**1.7062**	**15.6156**	**16.3634**	**0.0269**		**0.8090**	**0.8090**		**0.7612**	**0.7612**		**2,554.3336**	**2,554.3336**	**0.6120**		**2,569.6322**

3.5 Building Construction - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.4284	13.1673	3.8005	0.0354	0.9155	0.0256	0.9412	0.2636	0.0245	0.2881		3,789.0750	3,789.0750	0.2381		3,795.0283
Worker	2.6620	1.6677	19.4699	0.0571	6.0932	0.0493	6.1425	1.6163	0.0454	1.6617		5,691.9354	5,691.9354	0.1602		5,695.9408
Total	**3.0904**	**14.8350**	**23.2704**	**0.0926**	**7.0087**	**0.0749**	**7.0836**	**1.8799**	**0.0699**	**1.9498**		**9,481.0104**	**9,481.0104**	**0.3984**		**9,490.9691**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.7062	15.6156	16.3634	0.0269		0.8090	0.8090		0.7612	0.7612	0.0000	2,554.3336	2,554.3336	0.6120		2,569.6322
Total	**1.7062**	**15.6156**	**16.3634**	**0.0269**		**0.8090**	**0.8090**		**0.7612**	**0.7612**	**0.0000**	**2,554.3336**	**2,554.3336**	**0.6120**		**2,569.6322**

3.5 Building Construction - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.4284	13.1673	3.8005	0.0354	0.9155	0.0256	0.9412	0.2636	0.0245	0.2881		3,789.0750	3,789.0750	0.2381		3,795.0283
Worker	2.6620	1.6677	19.4699	0.0571	6.0932	0.0493	6.1425	1.6163	0.0454	1.6617		5,691.9354	5,691.9354	0.1602		5,695.9408
Total	**3.0904**	**14.8350**	**23.2704**	**0.0926**	**7.0087**	**0.0749**	**7.0836**	**1.8799**	**0.0699**	**1.9498**		**9,481.0104**	**9,481.0104**	**0.3984**		**9,490.9691**

3.5 Building Construction - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.5728	14.3849	16.2440	0.0269		0.6997	0.6997		0.6584	0.6584		2,555.2099	2,555.2099	0.6079		2,570.4061
Total	**1.5728**	**14.3849**	**16.2440**	**0.0269**		**0.6997**	**0.6997**		**0.6584**	**0.6584**		**2,555.2099**	**2,555.2099**	**0.6079**		**2,570.4061**

3.5 Building Construction - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.3183	9.9726	3.3771	0.0343	0.9156	0.0122	0.9277	0.2636	0.0116	0.2752		3,671.4007	3,671.4007	0.2096		3,676.6417
Worker	2.5029	1.5073	17.8820	0.0550	6.0932	0.0479	6.1411	1.6163	0.0441	1.6604		5,483.7974	5,483.7974	0.1442		5,487.4020
Total	**2.8211**	**11.4799**	**21.2591**	**0.0893**	**7.0088**	**0.0601**	**7.0688**	**1.8799**	**0.0557**	**1.9356**		**9,155.1981**	**9,155.1981**	**0.3538**		**9,164.0437**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.5728	14.3849	16.2440	0.0269		0.6997	0.6997		0.6584	0.6584	0.0000	2,555.2099	2,555.2099	0.6079		2,570.4061
Total	**1.5728**	**14.3849**	**16.2440**	**0.0269**		**0.6997**	**0.6997**		**0.6584**	**0.6584**	**0.0000**	**2,555.2099**	**2,555.2099**	**0.6079**		**2,570.4061**

3.5 Building Construction - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.3183	9.9726	3.3771	0.0343	0.9156	0.0122	0.9277	0.2636	0.0116	0.2752		3,671.4007	3,671.4007	0.2096		3,676.6417
Worker	2.5029	1.5073	17.8820	0.0550	6.0932	0.0479	6.1411	1.6163	0.0441	1.6604		5,483.7974	5,483.7974	0.1442		5,487.4020
Total	**2.8211**	**11.4799**	**21.2591**	**0.0893**	**7.0088**	**0.0601**	**7.0688**	**1.8799**	**0.0557**	**1.9356**		**9,155.1981**	**9,155.1981**	**0.3538**		**9,164.0437**

3.6 Paving - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.0327	10.1917	14.5842	0.0228		0.5102	0.5102		0.4694	0.4694		2,207.5841	2,207.5841	0.7140		2,225.4336
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**1.0327**	**10.1917**	**14.5842**	**0.0228**		**0.5102**	**0.5102**		**0.4694**	**0.4694**		**2,207.5841**	**2,207.5841**	**0.7140**		**2,225.4336**

3.6 Paving - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0469	0.0282	0.3349	1.0300e-003	0.1141	9.0000e-004	0.1150	0.0303	8.3000e-004	0.0311		102.6928	102.6928	2.7000e-003		102.7603
Total	**0.0469**	**0.0282**	**0.3349**	**1.0300e-003**	**0.1141**	**9.0000e-004**	**0.1150**	**0.0303**	**8.3000e-004**	**0.0311**		**102.6928**	**102.6928**	**2.7000e-003**		**102.7603**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.0327	10.1917	14.5842	0.0228		0.5102	0.5102		0.4694	0.4694	0.0000	2,207.5841	2,207.5841	0.7140		2,225.4336
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**1.0327**	**10.1917**	**14.5842**	**0.0228**		**0.5102**	**0.5102**		**0.4694**	**0.4694**	**0.0000**	**2,207.5841**	**2,207.5841**	**0.7140**		**2,225.4336**

3.6 Paving - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0469	0.0282	0.3349	1.0300e-003	0.1141	9.0000e-004	0.1150	0.0303	8.3000e-004	0.0311		102.6928	102.6928	2.7000e-003		102.7603
Total	**0.0469**	**0.0282**	**0.3349**	**1.0300e-003**	**0.1141**	**9.0000e-004**	**0.1150**	**0.0303**	**8.3000e-004**	**0.0311**		**102.6928**	**102.6928**	**2.7000e-003**		**102.7603**

3.6 Paving - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.9882	9.5246	14.6258	0.0228		0.4685	0.4685		0.4310	0.4310		2,207.5472	2,207.5472	0.7140		2,225.3963
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**0.9882**	**9.5246**	**14.6258**	**0.0228**		**0.4685**	**0.4685**		**0.4310**	**0.4310**		**2,207.5472**	**2,207.5472**	**0.7140**		**2,225.3963**

3.6 Paving - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0444	0.0257	0.3114	1.0000e-003	0.1141	8.8000e-004	0.1150	0.0303	8.1000e-004	0.0311		99.5045	99.5045	2.4700e-003		99.5663
Total	**0.0444**	**0.0257**	**0.3114**	**1.0000e-003**	**0.1141**	**8.8000e-004**	**0.1150**	**0.0303**	**8.1000e-004**	**0.0311**		**99.5045**	**99.5045**	**2.4700e-003**		**99.5663**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.9882	9.5246	14.6258	0.0228		0.4685	0.4685		0.4310	0.4310	0.0000	2,207.5472	2,207.5472	0.7140		2,225.3963
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**0.9882**	**9.5246**	**14.6258**	**0.0228**		**0.4685**	**0.4685**		**0.4310**	**0.4310**	**0.0000**	**2,207.5472**	**2,207.5472**	**0.7140**		**2,225.3963**

3.6 Paving - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0444	0.0257	0.3114	1.0000e-003	0.1141	8.8000e-004	0.1150	0.0303	8.1000e-004	0.0311		99.5045	99.5045	2.4700e-003		99.5663
Total	**0.0444**	**0.0257**	**0.3114**	**1.0000e-003**	**0.1141**	**8.8000e-004**	**0.1150**	**0.0303**	**8.1000e-004**	**0.0311**		**99.5045**	**99.5045**	**2.4700e-003**		**99.5663**

3.7 Architectural Coating - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	236.4115					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1808	1.2188	1.8101	2.9700e-003		0.0609	0.0609		0.0609	0.0609		281.4481	281.4481	0.0159		281.8443
Total	**236.5923**	**1.2188**	**1.8101**	**2.9700e-003**		**0.0609**	**0.0609**		**0.0609**	**0.0609**		**281.4481**	**281.4481**	**0.0159**		**281.8443**

3.7 Architectural Coating - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.4734	0.2743	3.3220	0.0107	1.2171	9.4300e-003	1.2266	0.3229	8.6800e-003	0.3315		1,061.3818	1,061.3818	0.0264		1,062.0410
Total	**0.4734**	**0.2743**	**3.3220**	**0.0107**	**1.2171**	**9.4300e-003**	**1.2266**	**0.3229**	**8.6800e-003**	**0.3315**		**1,061.3818**	**1,061.3818**	**0.0264**		**1,062.0410**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	236.4115					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1808	1.2188	1.8101	2.9700e-003		0.0609	0.0609		0.0609	0.0609	0.0000	281.4481	281.4481	0.0159		281.8443
Total	**236.5923**	**1.2188**	**1.8101**	**2.9700e-003**		**0.0609**	**0.0609**		**0.0609**	**0.0609**	**0.0000**	**281.4481**	**281.4481**	**0.0159**		**281.8443**

3.7 Architectural Coating - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.4734	0.2743	3.3220	0.0107	1.2171	9.4300e-003	1.2266	0.3229	8.6800e-003	0.3315		1,061.3818	1,061.3818	0.0264		1,062.0410
Total	**0.4734**	**0.2743**	**3.3220**	**0.0107**	**1.2171**	**9.4300e-003**	**1.2266**	**0.3229**	**8.6800e-003**	**0.3315**		**1,061.3818**	**1,061.3818**	**0.0264**		**1,062.0410**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	9.5233	45.9914	110.0422	0.4681	45.9592	0.3373	46.2965	12.2950	0.3132	12.6083		47,917.8005	47,917.8005	2.1953		47,972.6839
Unmitigated	9.5233	45.9914	110.0422	0.4681	45.9592	0.3373	46.2965	12.2950	0.3132	12.6083		47,917.8005	47,917.8005	2.1953		47,972.6839

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Apartments Low Rise	145.75	154.25	154.00	506,227	506,227
Apartments Mid Rise	4,026.75	3,773.25	4075.50	13,660,065	13,660,065
General Office Building	288.45	62.55	31.05	706,812	706,812
High Turnover (Sit Down Restaurant)	2,368.80	2,873.52	2817.72	3,413,937	3,413,937
Hotel	192.00	187.50	160.00	445,703	445,703
Quality Restaurant	501.12	511.92	461.20	707,488	707,488
Regional Shopping Center	528.08	601.44	357.84	1,112,221	1,112,221
Total	8,050.95	8,164.43	8,057.31	20,552,452	20,552,452

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Apartments Low Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3
Apartments Mid Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3
General Office Building	16.60	8.40	6.90	33.00	48.00	19.00	77	19	4
High Turnover (Sit Down	16.60	8.40	6.90	8.50	72.50	19.00	37	20	43
Hotel	16.60	8.40	6.90	19.40	61.60	19.00	58	38	4
Quality Restaurant	16.60	8.40	6.90	12.00	69.00	19.00	38	18	44
Regional Shopping Center	16.60	8.40	6.90	16.30	64.70	19.00	54	35	11

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Apartments Low Rise	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Apartments Mid Rise	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
General Office Building	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
High Turnover (Sit Down Restaurant)	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Hotel	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Quality Restaurant	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Regional Shopping Center	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387
NaturalGas Unmitigated	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Apartments Low Rise	1119.16	0.0121	0.1031	0.0439	6.6000e-004		8.3400e-003	8.3400e-003		8.3400e-003	8.3400e-003		131.6662	131.6662	2.5200e-003	2.4100e-003	132.4486
Apartments Mid Rise	35784.3	0.3859	3.2978	1.4033	0.0211		0.2666	0.2666		0.2666	0.2666		4,209.9164	4,209.9164	0.0807	0.0772	4,234.9339
General Office Building	1283.42	0.0138	0.1258	0.1057	7.5000e-004		9.5600e-003	9.5600e-003		9.5600e-003	9.5600e-003		150.9911	150.9911	2.8900e-003	2.7700e-003	151.8884
High Turnover (Sit Down Restaurant)	22759.9	0.2455	2.2314	1.8743	0.0134		0.1696	0.1696		0.1696	0.1696		2,677.6342	2,677.6342	0.0513	0.0491	2,693.5460
Hotel	4769.72	0.0514	0.4676	0.3928	2.8100e-003		0.0355	0.0355		0.0355	0.0355		561.1436	561.1436	0.0108	0.0103	564.4782
Quality Restaurant	5057.75	0.0545	0.4959	0.4165	2.9800e-003		0.0377	0.0377		0.0377	0.0377		595.0298	595.0298	0.0114	0.0109	598.5658
Regional Shopping Center	251.616	2.7100e-003	0.0247	0.0207	1.5000e-004		1.8700e-003	1.8700e-003		1.8700e-003	1.8700e-003		29.6019	29.6019	5.7000e-004	5.4000e-004	29.7778
Total		**0.7660**	**6.7463**	**4.2573**	**0.0418**		**0.5292**	**0.5292**		**0.5292**	**0.5292**		**8,355.9832**	**8,355.9832**	**0.1602**	**0.1532**	**8,405.6387**

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Apartments Low Rise	1.11916	0.0121	0.1031	0.0439	6.6000e-004		8.3400e-003	8.3400e-003		8.3400e-003	8.3400e-003		131.6662	131.6662	2.5200e-003	2.4100e-003	132.4486
Apartments Mid Rise	35.7843	0.3859	3.2978	1.4033	0.0211		0.2666	0.2666		0.2666	0.2666		4,209.9164	4,209.9164	0.0807	0.0772	4,234.9339
General Office Building	1.28342	0.0138	0.1258	0.1057	7.5000e-004		9.5600e-003	9.5600e-003		9.5600e-003	9.5600e-003		150.9911	150.9911	2.8900e-003	2.7700e-003	151.8884
High Turnover (Sit Down Restaurant)	22.7599	0.2455	2.2314	1.8743	0.0134		0.1696	0.1696		0.1696	0.1696		2,677.6342	2,677.6342	0.0513	0.0491	2,693.5460
Hotel	4.76972	0.0514	0.4676	0.3928	2.8100e-003		0.0355	0.0355		0.0355	0.0355		561.1436	561.1436	0.0108	0.0103	564.4782
Quality Restaurant	5.05775	0.0545	0.4959	0.4165	2.9800e-003		0.0377	0.0377		0.0377	0.0377		595.0298	595.0298	0.0114	0.0109	598.5658
Regional Shopping Center	0.251616	2.7100e-003	0.0247	0.0207	1.5000e-004		1.8700e-003	1.8700e-003		1.8700e-003	1.8700e-003		29.6019	29.6019	5.7000e-004	5.4000e-004	29.7778
Total		**0.7660**	**6.7463**	**4.2573**	**0.0418**		**0.5292**	**0.5292**		**0.5292**	**0.5292**		**8,355.9832**	**8,355.9832**	**0.1602**	**0.1532**	**8,405.6387**

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192
Unmitigated	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	2.2670					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	24.1085					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	1.6500	14.1000	6.0000	0.0900		1.1400	1.1400		1.1400	1.1400	0.0000	18,000.0000	18,000.0000	0.3450	0.3300	18,106.9650
Landscaping	2.4766	0.9496	82.4430	4.3600e-003		0.4574	0.4574		0.4574	0.4574		148.5950	148.5950	0.1424		152.1542
Total	**30.5020**	**15.0496**	**88.4430**	**0.0944**		**1.5974**	**1.5974**		**1.5974**	**1.5974**	**0.0000**	**18,148.5950**	**18,148.5950**	**0.4874**	**0.3300**	**18,259.1192**

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	2.2670					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	24.1085					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	1.6500	14.1000	6.0000	0.0900		1.1400	1.1400		1.1400	1.1400	0.0000	18,000.0000	18,000.0000	0.3450	0.3300	18,106.9650
Landscaping	2.4766	0.9496	82.4430	4.3600e-003		0.4574	0.4574		0.4574	0.4574		148.5950	148.5950	0.1424		152.1542
Total	**30.5020**	**15.0496**	**88.4430**	**0.0944**		**1.5974**	**1.5974**		**1.5974**	**1.5974**	**0.0000**	**18,148.5950**	**18,148.5950**	**0.4874**	**0.3300**	**18,259.1192**

7.0 Water Detail

7.1 Mitigation Measures Water

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

Attachment C

Local Hire Provision Net Change	
Without Local Hire Provision	
Total Construction GHG Emissions (MT CO2e)	3,623
Amortized (MT CO2e/year)	120.77
With Local Hire Provision	
Total Construction GHG Emissions (MT CO2e)	3,024
Amortized (MT CO2e/year)	100.80
% Decrease in Construction-related GHG Emissions	***17%***

EXHIBIT B

SWAPE Technical Consultation, Data Analysis and Litigation Support for the Environment

SOIL WATER AIR PROTECTION ENTERPRISE
2656 29th Street, Suite 201
Santa Monica, California 90405
Attn: Paul Rosenfeld, Ph.D.
Mobil: (310) 795-2335
Office: (310) 452-5555
Fax: (310) 452-5550
Email: prosenfeld@swape.com

Paul Rosenfeld, Ph.D.

Chemical Fate and Transport & Air Dispersion Modeling

Principal Environmental Chemist

Risk Assessment & Remediation Specialist

Education

Ph.D. Soil Chemistry, University of Washington, 1999. Dissertation on volatile organic compound filtration.

M.S. Environmental Science, U.C. Berkeley, 1995. Thesis on organic waste economics.

B.A. Environmental Studies, U.C. Santa Barbara, 1991. Thesis on wastewater treatment.

Professional Experience

Dr. Rosenfeld has over 25 years' experience conducting environmental investigations and risk assessments for evaluating impacts to human health, property, and ecological receptors. His expertise focuses on the fate and transport of environmental contaminants, human health risk, exposure assessment, and ecological restoration. Dr. Rosenfeld has evaluated and modeled emissions from unconventional oil drilling operations, oil spills, landfills, boilers and incinerators, process stacks, storage tanks, confined animal feeding operations, and many other industrial and agricultural sources. His project experience ranges from monitoring and modeling of pollution sources to evaluating impacts of pollution on workers at industrial facilities and residents in surrounding communities.

Dr. Rosenfeld has investigated and designed remediation programs and risk assessments for contaminated sites containing lead, heavy metals, mold, bacteria, particulate matter, petroleum hydrocarbons, chlorinated solvents, pesticides, radioactive waste, dioxins and furans, semi- and volatile organic compounds, PCBs, PAHs, perchlorate, asbestos, per- and poly-fluoroalkyl substances (PFOA/PFOS), unusual polymers, fuel oxygenates (MTBE), among other pollutants. Dr. Rosenfeld also has experience evaluating greenhouse gas emissions from various projects and is an expert on the assessment of odors from industrial and agricultural sites, as well as the evaluation of odor nuisance impacts and technologies for abatement of odorous emissions. As a principal scientist at SWAPE, Dr. Rosenfeld directs air dispersion modeling and exposure assessments. He has served as an expert witness and testified about pollution sources causing nuisance and/or personal injury at dozens of sites and has testified as an expert witness on more than ten cases involving exposure to air contaminants from industrial sources.

Professional History:

Soil Water Air Protection Enterprise (SWAPE); 2003 to present; Principal and Founding Partner
UCLA School of Public Health; 2007 to 2011; Lecturer (Assistant Researcher)
UCLA School of Public Health; 2003 to 2006; Adjunct Professor
UCLA Environmental Science and Engineering Program; 2002-2004; Doctoral Intern Coordinator
UCLA Institute of the Environment, 2001-2002; Research Associate
Komex H_2O Science, 2001 to 2003; Senior Remediation Scientist
National Groundwater Association, 2002-2004; Lecturer
San Diego State University, 1999-2001; Adjunct Professor
Anteon Corp., San Diego, 2000-2001; Remediation Project Manager
Ogden (now Amec), San Diego, 2000-2000; Remediation Project Manager
Bechtel, San Diego, California, 1999 – 2000; Risk Assessor
King County, Seattle, 1996 – 1999; Scientist
James River Corp., Washington, 1995-96; Scientist
Big Creek Lumber, Davenport, California, 1995; Scientist
Plumas Corp., California and USFS, Tahoe 1993-1995; Scientist
Peace Corps and World Wildlife Fund, St. Kitts, West Indies, 1991-1993; Scientist

Publications:

Remy, L.L., Clay T., Byers, V., **Rosenfeld P. E.** (2019) Hospital, Health, and Community Burden After Oil Refinery Fires, Richmond, California 2007 and 2012. *Environmental Health.* 18:48

Simons, R.A., Seo, Y. **Rosenfeld, P**., (2015) Modeling the Effect of Refinery Emission On Residential Property Value. Journal of Real Estate Research. 27(3):321-342

Chen, J. A, Zapata A. R., Sutherland A. J., Molmen, D.R., Chow, B. S., Wu, L. E., **Rosenfeld, P. E.,** Hesse, R. C., (2012) Sulfur Dioxide and Volatile Organic Compound Exposure To A Community In Texas City Texas Evaluated Using Aermod and Empirical Data. *American Journal of Environmental Science*, 8(6), 622-632.

Rosenfeld, P.E. & Feng, L. (2011). *The Risks of Hazardous Waste.* Amsterdam: Elsevier Publishing.

Cheremisinoff, N.P., & **Rosenfeld, P.E.** (2011). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Agrochemical Industry*, Amsterdam: Elsevier Publishing.

Gonzalez, J., Feng, L., Sutherland, A., Waller, C., Sok, H., Hesse, R., **Rosenfeld, P.** (2010). PCBs and Dioxins/Furans in Attic Dust Collected Near Former PCB Production and Secondary Copper Facilities in Sauget, IL. *Procedia Environmental Sciences*. 113–125.

Feng, L., Wu, C., Tam, L., Sutherland, A.J., Clark, J.J., **Rosenfeld, P.E.** (2010). Dioxin and Furan Blood Lipid and Attic Dust Concentrations in Populations Living Near Four Wood Treatment Facilities in the United States. *Journal of Environmental Health*. 73(6), 34-46.

Cheremisinoff, N.P., & **Rosenfeld, P.E.** (2010). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Wood and Paper Industries.* Amsterdam: Elsevier Publishing.

Cheremisinoff, N.P., & **Rosenfeld, P.E.** (2009). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Petroleum Industry*. Amsterdam: Elsevier Publishing.

Wu, C., Tam, L., Clark, J., **Rosenfeld, P**. (2009). Dioxin and furan blood lipid concentrations in populations living near four wood treatment facilities in the United States. *WIT Transactions on Ecology and the Environment, Air Pollution,* 123 (17), 319-327.

Tam L. K.., Wu C. D., Clark J. J. and **Rosenfeld, P.E.** (2008). A Statistical Analysis Of Attic Dust And Blood Lipid Concentrations Of Tetrachloro-p-Dibenzodioxin (TCDD) Toxicity Equivalency Quotients (TEQ) In Two Populations Near Wood Treatment Facilities. *Organohalogen Compounds*, 70, 002252-002255.

Tam L. K.., Wu C. D., Clark J. J. and **Rosenfeld, P.E.** (2008). Methods For Collect Samples For Assessing Dioxins And Other Environmental Contaminants In Attic Dust: A Review. *Organohalogen Compounds*, 70, 000527-000530.

Hensley, A.R. A. Scott, J. J. J. Clark, **Rosenfeld, P.E.** (2007). Attic Dust and Human Blood Samples Collected near a Former Wood Treatment Facility. *Environmental Research*. 105, 194-197.

Rosenfeld, P.E., J. J. J. Clark, A. R. Hensley, M. Suffet. (2007). The Use of an Odor Wheel Classification for Evaluation of Human Health Risk Criteria for Compost Facilities. *Water Science & Technology* 55(5), 345-357.

Rosenfeld, P. E., M. Suffet. (2007). The Anatomy Of Odour Wheels For Odours Of Drinking Water, Wastewater, Compost And The Urban Environment. *Water Science & Technology* 55(5), 335-344.

Sullivan, P. J. Clark, J.J.J., Agardy, F. J., **Rosenfeld, P.E.** (2007). *Toxic Legacy, Synthetic Toxins in the Food, Water, and Air in American Cities.* Boston Massachusetts: Elsevier Publishing

Rosenfeld, P.E., and Suffet I.H. (2004). Control of Compost Odor Using High Carbon Wood Ash. *Water Science and Technology*. 49(9),171-178.

Rosenfeld P. E., J.J. Clark, I.H. (Mel) Suffet (2004). The Value of An Odor-Quality-Wheel Classification Scheme For The Urban Environment. *Water Environment Federation's Technical Exhibition and Conference (WEFTEC) 2004.* New Orleans, October 2-6, 2004.

Rosenfeld, P.E., and Suffet, I.H. (2004). Understanding Odorants Associated With Compost, Biomass Facilities, and the Land Application of Biosolids. *Water Science and Technology*. 49(9), 193-199.

Rosenfeld, P.E., and Suffet I.H. (2004). Control of Compost Odor Using High Carbon Wood Ash, *Water Science and Technology*, 49(9), 171-178.

Rosenfeld, P. E., Grey, M. A., Sellew, P. (2004). Measurement of Biosolids Odor and Odorant Emissions from Windrows, Static Pile and Biofilter. *Water Environment Research*. 76(4), 310-315.

Rosenfeld, P.E., Grey, M and Suffet, M. (2002). Compost Demonstration Project, Sacramento California Using High-Carbon Wood Ash to Control Odor at a Green Materials Composting Facility. *Integrated Waste Management Board Public Affairs Office*, Publications Clearinghouse (MS–6), Sacramento, CA Publication #442-02-008.

Rosenfeld, P.E., and C.L. Henry. (2001). Characterization of odor emissions from three different biosolids. *Water Soil and Air Pollution*. 127(1-4), 173-191.

Rosenfeld, P.E., and Henry C. L., (2000). Wood ash control of odor emissions from biosolids application. *Journal of Environmental Quality.* 29, 1662-1668.

Rosenfeld, P.E., C.L. Henry and D. Bennett. (2001). Wastewater dewatering polymer affect on biosolids odor emissions and microbial activity. *Water Environment Research*. 73(4), 363-367.

Rosenfeld, P.E., and C.L. Henry. (2001). Activated Carbon and Wood Ash Sorption of Wastewater, Compost, and Biosolids Odorants. *Water Environment Research*, 73, 388-393.

Rosenfeld, P.E., and Henry C. L., (2001). High carbon wood ash effect on biosolids microbial activity and odor. *Water Environment Research*. 131(1-4), 247-262.

Chollack, T. and **P. Rosenfeld. (**1998). Compost Amendment Handbook For Landscaping. Prepared for and distributed by the City of Redmond, Washington State.

Rosenfeld, P. E. (1992). The Mount Liamuiga Crater Trail. *Heritage Magazine of St. Kitts*, 3(2).

Rosenfeld, P. E. (1993). High School Biogas Project to Prevent Deforestation On St. Kitts. *Biomass Users Network*, 7(1).

Rosenfeld, P. E. (1998). Characterization, Quantification, and Control of Odor Emissions From Biosolids Application To Forest Soil. Doctoral Thesis. University of Washington College of Forest Resources.

Rosenfeld, P. E. (1994). Potential Utilization of Small Diameter Trees on Sierra County Public Land. Masters thesis reprinted by the Sierra County Economic Council. Sierra County, California.

Rosenfeld, P. E. (1991). How to Build a Small Rural Anaerobic Digester & Uses Of Biogas In The First And Third World. Bachelors Thesis. University of California.

Presentations:

Rosenfeld, P.E., Sutherland, A; Hesse, R.; Zapata, A. (October 3-6, 2013). Air dispersion modeling of volatile organic emissions from multiple natural gas wells in Decatur, TX. *44th Western Regional Meeting, American Chemical Society.* Lecture conducted from Santa Clara, CA.

Sok, H.L.; Waller, C.C.; Feng, L.; Gonzalez, J.; Sutherland, A.J.; Wisdom-Stack, T.; Sahai, R.K.; Hesse, R.C.; **Rosenfeld, P.E.** (June 20-23, 2010). Atrazine: A Persistent Pesticide in Urban Drinking Water. *Urban Environmental Pollution*. Lecture conducted from Boston, MA.

Feng, L.; Gonzalez, J.; Sok, H.L.; Sutherland, A.J.; Waller, C.C.; Wisdom-Stack, T.; Sahai, R.K.; La, M.; Hesse, R.C.; **Rosenfeld, P.E.** (June 20-23, 2010). Bringing Environmental Justice to East St. Louis, Illinois. *Urban Environmental Pollution.* Lecture conducted from Boston, MA.

Rosenfeld, P.E. (April 19-23, 2009). Perfluoroctanoic Acid (PFOA) and Perfluoroactane Sulfonate (PFOS) Contamination in Drinking Water From the Use of Aqueous Film Forming Foams (AFFF) at Airports in the United States. *2009 Ground Water Summit and 2009 Ground Water Protection Council Spring Meeting*, Lecture conducted from Tuscon, AZ.

Rosenfeld, P.E. (April 19-23, 2009). Cost to Filter Atrazine Contamination from Drinking Water in the United States" Contamination in Drinking Water From the Use of Aqueous Film Forming Foams (AFFF) at Airports in the United States. *2009 Ground Water Summit and 2009 Ground Water Protection Council Spring Meeting*. Lecture conducted from Tuscon, AZ.

Wu, C., Tam, L., Clark, J., **Rosenfeld, P**. (20-22 July, 2009). Dioxin and furan blood lipid concentrations in populations living near four wood treatment facilities in the United States. Brebbia, C.A. and Popov, V., eds., *Air Pollution XVII: Proceedings of the Seventeenth International Conference on Modeling, Monitoring and Management of Air Pollution*. Lecture conducted from Tallinn, Estonia.

Rosenfeld, P. E. (October 15-18, 2007). Moss Point Community Exposure To Contaminants From A Releasing Facility. *The 23rd Annual International Conferences on Soils Sediment and Water.* Platform lecture conducted from University of Massachusetts, Amherst MA.

Rosenfeld, P. E. (October 15-18, 2007). The Repeated Trespass of Tritium-Contaminated Water Into A Surrounding Community Form Repeated Waste Spills From A Nuclear Power Plant. *The 23rd Annual International Conferences on Soils Sediment and Water*. Platform lecture conducted from University of Massachusetts, Amherst MA.

Rosenfeld, P. E. (October 15-18, 2007). Somerville Community Exposure To Contaminants From Wood Treatment Facility Emissions. The *23rd Annual International Conferences on Soils Sediment and Water*. Lecture conducted from University of Massachusetts, Amherst MA.

Rosenfeld P. E. (March 2007). Production, Chemical Properties, Toxicology, & Treatment Case Studies of 1,2,3-Trichloropropane (TCP). *The Association for Environmental Health and Sciences (AEHS) Annual Meeting*. Lecture conducted from San Diego, CA.

Rosenfeld P. E. (March 2007). Blood and Attic Sampling for Dioxin/Furan, PAH, and Metal Exposure in Florala, Alabama. *The AEHS Annual Meeting.* Lecture conducted from San Diego, CA.

Hensley A.R., Scott, A., **Rosenfeld P.E.,** Clark, J.J.J. (August 21 – 25, 2006). Dioxin Containing Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility. *The 26th International Symposium on Halogenated Persistent Organic Pollutants – DIOXIN2006*. Lecture conducted from Radisson SAS Scandinavia Hotel in Oslo Norway.

Hensley A.R., Scott, A., **Rosenfeld P.E.,** Clark, J.J.J. (November 4-8, 2006). Dioxin Containing Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility. *APHA 134 Annual Meeting & Exposition.* Lecture conducted from Boston Massachusetts.

Paul Rosenfeld Ph.D. (October 24-25, 2005). Fate, Transport and Persistence of PFOA and Related Chemicals. Mealey's C8/PFOA. *Science, Risk & Litigation Conference.* Lecture conducted from The Rittenhouse Hotel, Philadelphia, PA.

Paul Rosenfeld Ph.D. (September 19, 2005). Brominated Flame Retardants in Groundwater: Pathways to Human Ingestion, *Toxicology and Remediation PEMA Emerging Contaminant Conference*. Lecture conducted from Hilton Hotel, Irvine California.

Paul Rosenfeld Ph.D. (September 19, 2005). Fate, Transport, Toxicity, And Persistence of 1,2,3-TCP. *PEMA Emerging Contaminant Conference.* Lecture conducted from Hilton Hotel in Irvine, California.

Paul Rosenfeld Ph.D. (September 26-27, 2005). Fate, Transport and Persistence of PDBEs. *Mealey's Groundwater Conference.* Lecture conducted from Ritz Carlton Hotel, Marina Del Ray, California.

Paul Rosenfeld Ph.D. (June 7-8, 2005). Fate, Transport and Persistence of PFOA and Related Chemicals. *International Society of Environmental Forensics: Focus On Emerging Contaminants*. Lecture conducted from Sheraton Oceanfront Hotel, Virginia Beach, Virginia.

Paul Rosenfeld Ph.D. (July 21-22, 2005). Fate Transport, Persistence and Toxicology of PFOA and Related Perfluorochemicals. *2005 National Groundwater Association Ground Water And Environmental Law Conference*. Lecture conducted from Wyndham Baltimore Inner Harbor, Baltimore Maryland.

Paul Rosenfeld Ph.D. (July 21-22, 2005). Brominated Flame Retardants in Groundwater: Pathways to Human Ingestion, Toxicology and Remediation. *2005 National Groundwater Association Ground Water and Environmental Law Conference.* Lecture conducted from Wyndham Baltimore Inner Harbor, Baltimore Maryland.

Paul Rosenfeld, Ph.D. and James Clark Ph.D. and Rob Hesse R.G. (May 5-6, 2004). Tert-butyl Alcohol Liability and Toxicology, A National Problem and Unquantified Liability. *National Groundwater Association. Environmental Law Conference*. Lecture conducted from Congress Plaza Hotel, Chicago Illinois.

Paul Rosenfeld, Ph.D. (March 2004). Perchlorate Toxicology. *Meeting of the American Groundwater Trust*. Lecture conducted from Phoenix Arizona.

Hagemann, M.F., **Paul Rosenfeld, Ph.D.** and Rob Hesse (2004). Perchlorate Contamination of the Colorado River. *Meeting of tribal representatives*. Lecture conducted from Parker, AZ.

Paul Rosenfeld, Ph.D. (April 7, 2004). A National Damage Assessment Model For PCE and Dry Cleaners. *Drycleaner Symposium. California Ground Water Association*. Lecture conducted from Radison Hotel, Sacramento, California.

Rosenfeld, P. E., Grey, M., (June 2003) Two stage biofilter for biosolids composting odor control. *Seventh International In Situ And On Site Bioremediation Symposium Battelle Conference* Orlando, FL.

Paul Rosenfeld, Ph.D. and James Clark Ph.D. (February 20-21, 2003) Understanding Historical Use, Chemical Properties, Toxicity and Regulatory Guidance of 1,4 Dioxane. *National Groundwater Association. Southwest Focus Conference. Water Supply and Emerging Contaminants*.. Lecture conducted from Hyatt Regency Phoenix Arizona.

Paul Rosenfeld, Ph.D. (February 6-7, 2003). Underground Storage Tank Litigation and Remediation. *California CUPA Forum*. Lecture conducted from Marriott Hotel, Anaheim California.

Paul Rosenfeld, Ph.D. (October 23, 2002) Underground Storage Tank Litigation and Remediation. *EPA Underground Storage Tank Roundtable*. Lecture conducted from Sacramento California.

Rosenfeld, P.E. and Suffet, M. (October 7- 10, 2002). Understanding Odor from Compost, *Wastewater and Industrial Processes. Sixth Annual Symposium On Off Flavors in the Aquatic Environment. International Water Association*. Lecture conducted from Barcelona Spain.

Rosenfeld, P.E. and Suffet, M. (October 7- 10, 2002). Using High Carbon Wood Ash to Control Compost Odor. *Sixth Annual Symposium On Off Flavors in the Aquatic Environment. International Water Association*. Lecture conducted from Barcelona Spain.

Rosenfeld, P.E. and Grey, M. A. (September 22-24, 2002). Biocycle Composting For Coastal Sage Restoration. *Northwest Biosolids Management Association*. Lecture conducted from Vancouver Washington..

Rosenfeld, P.E. and Grey, M. A. (November 11-14, 2002). Using High-Carbon Wood Ash to Control Odor at a Green Materials Composting Facility. *Soil Science Society Annual Conferenc*e. Lecture conducted from Indianapolis, Maryland.

Rosenfeld. P.E. (September 16, 2000). Two stage biofilter for biosolids composting odor control. *Water Environment Federation.* Lecture conducted from Anaheim California.

Rosenfeld. P.E. (October 16, 2000). Wood ash and biofilter control of compost odor. *Biofest.* Lecture conducted from Ocean Shores, California.

Rosenfeld, P.E. (2000). Bioremediation Using Organic Soil Amendments. *California Resource Recovery Association*. Lecture conducted from Sacramento California.

Rosenfeld, P.E., C.L. Henry, R. Harrison. (1998). Oat and Grass Seed Germination and Nitrogen and Sulfur Emissions Following Biosolids Incorporation With High-Carbon Wood-Ash. *Water Environment Federation 12th Annual Residuals and Biosolids Management Conference Proceedings*. Lecture conducted from Bellevue Washington.

Rosenfeld, P.E., and C.L. Henry. (1999). An evaluation of ash incorporation with biosolids for odor reduction. *Soil Science Society of America*. Lecture conducted from Salt Lake City Utah.

Rosenfeld, P.E., C.L. Henry, R. Harrison. (1998). Comparison of Microbial Activity and Odor Emissions from Three Different Biosolids Applied to Forest Soil. *Brown and Caldwell.* Lecture conducted from Seattle Washington.

Rosenfeld, P.E., C.L. Henry. (1998). Characterization, Quantification, and Control of Odor Emissions from Biosolids Application To Forest Soil. *Biofest.* Lecture conducted from Lake Chelan, Washington.

Rosenfeld, P.E, C.L. Henry, R. Harrison. (1998). Oat and Grass Seed Germination and Nitrogen and Sulfur Emissions Following Biosolids Incorporation With High-Carbon Wood-Ash. Water Environment Federation 12th Annual Residuals and Biosolids Management Conference Proceedings. Lecture conducted from Bellevue Washington.

Rosenfeld, P.E., C.L. Henry, R. B. Harrison, and R. Dills. (1997). Comparison of Odor Emissions From Three Different Biosolids Applied to Forest Soil. *Soil Science Society of America*. Lecture conducted from Anaheim California.

Teaching Experience:

UCLA Department of Environmental Health (Summer 2003 through 20010) Taught Environmental Health Science 100 to students, including undergrad, medical doctors, public health professionals and nurses. Course focused on the health effects of environmental contaminants.

National Ground Water Association, Successful Remediation Technologies. Custom Course in Sante Fe, New Mexico. May 21, 2002. Focused on fate and transport of fuel contaminants associated with underground storage tanks.

National Ground Water Association; Successful Remediation Technologies Course in Chicago Illinois. April 1, 2002. Focused on fate and transport of contaminants associated with Superfund and RCRA sites.

California Integrated Waste Management Board, April and May, 2001. Alternative Landfill Caps Seminar in San Diego, Ventura, and San Francisco. Focused on both prescriptive and innovative landfill cover design.

UCLA Department of Environmental Engineering, February 5, 2002. Seminar on Successful Remediation Technologies focusing on Groundwater Remediation.

University Of Washington, Soil Science Program, Teaching Assistant for several courses including: Soil Chemistry, Organic Soil Amendments, and Soil Stability.

U.C. Berkeley, Environmental Science Program Teaching Assistant for Environmental Science 10.

Academic Grants Awarded:

California Integrated Waste Management Board. $41,000 grant awarded to UCLA Institute of the Environment. Goal: To investigate effect of high carbon wood ash on volatile organic emissions from compost. 2001.

Synagro Technologies, Corona California: $10,000 grant awarded to San Diego State University.
Goal: investigate effect of biosolids for restoration and remediation of degraded coastal sage soils. 2000.

King County, Department of Research and Technology, Washington State. $100,000 grant awarded to University of Washington: Goal: To investigate odor emissions from biosolids application and the effect of polymers and ash on VOC emissions. 1998.

Northwest Biosolids Management Association, Washington State. $20,000 grant awarded to investigate effect of polymers and ash on VOC emissions from biosolids. 1997.

James River Corporation, Oregon: $10,000 grant was awarded to investigate the success of genetically engineered Poplar trees with resistance to round-up. 1996.

United State Forest Service, Tahoe National Forest: $15,000 grant was awarded to investigating fire ecology of the Tahoe National Forest. 1995.

Kellogg Foundation, Washington D.C. $500 grant was awarded to construct a large anaerobic digester on St. Kitts in West Indies. 1993

Deposition and/or Trial Testimony:

In the United States District Court For The District of New Jersey
Duarte et al, *Plaintiffs,* vs. United States Metals Refining Company et. al. *Defendant.*
Case No.: 2:17-cv-01624-ES-SCM
Rosenfeld Deposition. 6-7-2019

In the United States District Court of Southern District of Texas Galveston Division
M/T Carla Maersk, *Plaintiffs,* vs. Conti 168., Schiffahrts-GMBH & Co. Bulker KG MS "Conti Perdido" *Defendant.*
Case No.: 3:15-CV-00106 consolidated with 3:15-CV-00237
Rosenfeld Deposition. 5-9-2019

In The Superior Court of the State of California In And For The County Of Los Angeles – Santa Monica
Carole-Taddeo-Bates et al., vs. Ifran Khan et al., Defendants
Case No.: No. BC615636
Rosenfeld Deposition, 1-26-2019

In The Superior Court of the State of California In And For The County Of Los Angeles – Santa Monica
The San Gabriel Valley Council of Governments et al. vs El Adobe Apts. Inc. et al., Defendants
Case No.: No. BC646857
Rosenfeld Deposition, 10-6-2018; Trial 3-7-19

In United States District Court For The District of Colorado
Bells et al. Plaintiff vs. The 3M Company et al., Defendants
Case: No 1:16-cv-02531-RBJ
Rosenfeld Deposition, 3-15-2018 and 4-3-2018

In The District Court Of Regan County, Texas, 112th Judicial District
Phillip Bales et al., Plaintiff vs. Dow Agrosciences, LLC, et al., Defendants
Cause No 1923
Rosenfeld Deposition, 11-17-2017

In The Superior Court of the State of California In And For The County Of Contra Costa
Simons et al., Plaintiffs vs. Chevron Corporation, et al., Defendants
Cause No C12-01481
Rosenfeld Deposition, 11-20-2017

In The Circuit Court Of The Twentieth Judicial Circuit, St Clair County, Illinois
Martha Custer et al., Plaintiff vs. Cerro Flow Products, Inc., Defendants
Case No.: No. 0i9-L-2295
Rosenfeld Deposition, 8-23-2017

In The Superior Court of the State of California, For The County of Los Angeles
Warrn Gilbert and Penny Gilber, Plaintiff vs. BMW of North America LLC
Case No.: LC102019 (c/w BC582154)
Rosenfeld Deposition, 8-16-2017, Trail 8-28-2018

In the Northern District Court of Mississippi, Greenville Division
Brenda J. Cooper, et al., *Plaintiffs,* vs. Meritor Inc., et al., *Defendants*
Case Number: 4:16-cv-52-DMB-JVM
Rosenfeld Deposition: July 2017

In The Superior Court of the State of Washington, County of Snohomish
Michael Davis and Julie Davis et al., Plaintiff vs. Cedar Grove Composting Inc., Defendants
Case No.: No. 13-2-03987-5
Rosenfeld Deposition, February 2017
Trial, March 2017

In The Superior Court of the State of California, County of Alameda
Charles Spain., Plaintiff vs. Thermo Fisher Scientific, et al., Defendants
Case No.: RG14711115
Rosenfeld Deposition, September 2015

In The Iowa District Court In And For Poweshiek County
Russell D. Winburn, et al., Plaintiffs vs. Doug Hoksbergen, et al., Defendants
Case No.: LALA002187
Rosenfeld Deposition, August 2015

In The Iowa District Court For Wapello County
Jerry Dovico, et al., Plaintiffs vs. Valley View Sine LLC, et al., Defendants
Law No,: LALA105144 - Division A
Rosenfeld Deposition, August 2015

In The Iowa District Court For Wapello County
Doug Pauls, et al.,, et al., Plaintiffs vs. Richard Warren, et al., Defendants
Law No,: LALA105144 - Division A
Rosenfeld Deposition, August 2015

In The Circuit Court of Ohio County, West Virginia
Robert Andrews, et al. v. Antero, et al.
Civil Action N0. 14-C-30000
Rosenfeld Deposition, June 2015

In The Third Judicial District County of Dona Ana, New Mexico
Betty Gonzalez, et al. Plaintiffs vs. Del Oro Dairy, Del Oro Real Estate LLC, Jerry Settles and Deward DeRuyter, Defendants
Rosenfeld Deposition: July 2015

In The Iowa District Court For Muscatine County
Laurie Freeman et. al. Plaintiffs vs. Grain Processing Corporation, Defendant
Case No 4980
Rosenfeld Deposition: May 2015

In the Circuit Court of the 17th Judicial Circuit, in and For Broward County, Florida
Walter Hinton, et. al. Plaintiff, vs. City of Fort Lauderdale, Florida, a Municipality, Defendant.
Case Number CACE07030358 (26)
Rosenfeld Deposition: December 2014

In the United States District Court Western District of Oklahoma
Tommy McCarty, et al., Plaintiffs, v. Oklahoma City Landfill, LLC d/b/a Southeast Oklahoma City Landfill, et al. Defendants.
Case No. 5:12-cv-01152-C
Rosenfeld Deposition: July 2014

In the County Court of Dallas County Texas
Lisa Parr et al, *Plaintiff*, vs. Aruba et al, *Defendant.*
Case Number cc-11-01650-E
Rosenfeld Deposition: March and September 2013
Rosenfeld Trial: April 2014

In the Court of Common Pleas of Tuscarawas County Ohio
John Michael Abicht, et al., *Plaintiffs,* vs. Republic Services, Inc., et al., *Defendants*
Case Number: 2008 CT 10 0741 (Cons. w/ 2009 CV 10 0987)
Rosenfeld Deposition: October 2012

In the United States District Court of Southern District of Texas Galveston Division
Kyle Cannon, Eugene Donovan, Genaro Ramirez, Carol Sassler, and Harvey Walton, each Individually and on behalf of those similarly situated, *Plaintiffs,* vs. BP Products North America, Inc., *Defendant.*
Case 3:10-cv-00622
Rosenfeld Deposition: February 2012
Rosenfeld Trial: April 2013

In the Circuit Court of Baltimore County Maryland
Philip E. Cvach, II et al., *Plaintiffs* vs. Two Farms, Inc. d/b/a Royal Farms, Defendants
Case Number: 03-C-12-012487 OT
Rosenfeld Deposition: September 2013

EXHIBIT C

SWAPE Technical Consultation, Data Analysis and Litigation Support for the Environment

1640 5th St.., Suite 204 Santa
Santa Monica, California 90401
Tel: (949) 887-9013
Email: mhagemann@swape.com

Matthew F. Hagemann, P.G., C.Hg., QSD, QSP

Geologic and Hydrogeologic Characterization
Industrial Stormwater Compliance
Investigation and Remediation Strategies
Litigation Support and Testifying Expert
CEQA Review

Education:

M.S. Degree, Geology, California State University Los Angeles, Los Angeles, CA, 1984.
B.A. Degree, Geology, Humboldt State University, Arcata, CA, 1982.

Professional Certifications:

California Professional Geologist
California Certified Hydrogeologist
Qualified SWPPP Developer and Practitioner

Professional Experience:

Matt has 25 years of experience in environmental policy, assessment and remediation. He spent nine years with the U.S. EPA in the RCRA and Superfund programs and served as EPA's Senior Science Policy Advisor in the Western Regional Office where he identified emerging threats to groundwater from perchlorate and MTBE. While with EPA, Matt also served as a Senior Hydrogeologist in the oversight of the assessment of seven major military facilities undergoing base closure. He led numerous enforcement actions under provisions of the Resource Conservation and Recovery Act (RCRA) while also working with permit holders to improve hydrogeologic characterization and water quality monitoring.

Matt has worked closely with U.S. EPA legal counsel and the technical staff of several states in the application and enforcement of RCRA, Safe Drinking Water Act and Clean Water Act regulations. Matt has trained the technical staff in the States of California, Hawaii, Nevada, Arizona and the Territory of Guam in the conduct of investigations, groundwater fundamentals, and sampling techniques.

Positions Matt has held include:

- Founding Partner, Soil/Water/Air Protection Enterprise (SWAPE) (2003 – present);
- Geology Instructor, Golden West College, 2010 – 2014;
- Senior Environmental Analyst, Komex H2O Science, Inc. (2000 -- 2003);

- Executive Director, Orange Coast Watch (2001 – 2004);
- Senior Science Policy Advisor and Hydrogeologist, U.S. Environmental Protection Agency (1989–1998);
- Hydrogeologist, National Park Service, Water Resources Division (1998 – 2000);
- Adjunct Faculty Member, San Francisco State University, Department of Geosciences (1993 – 1998);
- Instructor, College of Marin, Department of Science (1990 – 1995);
- Geologist, U.S. Forest Service (1986 – 1998); and
- Geologist, Dames & Moore (1984 – 1986).

Senior Regulatory and Litigation Support Analyst:

With SWAPE, Matt's responsibilities have included:

- Lead analyst and testifying expert in the review of over 100 environmental impact reports since 2003 under CEQA that identify significant issues with regard to hazardous waste, water resources, water quality, air quality, Valley Fever, greenhouse gas emissions, and geologic hazards. Make recommendations for additional mitigation measures to lead agencies at the local and county level to include additional characterization of health risks and implementation of protective measures to reduce worker exposure to hazards from toxins and Valley Fever.
- Stormwater analysis, sampling and best management practice evaluation at industrial facilities.
- Manager of a project to provide technical assistance to a community adjacent to a former Naval shipyard under a grant from the U.S. EPA.
- Technical assistance and litigation support for vapor intrusion concerns.
- Lead analyst and testifying expert in the review of environmental issues in license applications for large solar power plants before the California Energy Commission.
- Manager of a project to evaluate numerous formerly used military sites in the western U.S.
- Manager of a comprehensive evaluation of potential sources of perchlorate contamination in Southern California drinking water wells.
- Manager and designated expert for litigation support under provisions of Proposition 65 in the review of releases of gasoline to sources drinking water at major refineries and hundreds of gas stations throughout California.
- Expert witness on two cases involving MTBE litigation.
- Expert witness and litigation support on the impact of air toxins and hazards at a school.
- Expert witness in litigation at a former plywood plant.

With Komex H2O Science Inc., Matt's duties included the following:

- Senior author of a report on the extent of perchlorate contamination that was used in testimony by the former U.S. EPA Administrator and General Counsel.
- Senior researcher in the development of a comprehensive, electronically interactive chronology of MTBE use, research, and regulation.
- Senior researcher in the development of a comprehensive, electronically interactive chronology of perchlorate use, research, and regulation.
- Senior researcher in a study that estimates nationwide costs for MTBE remediation and drinking water treatment, results of which were published in newspapers nationwide and in testimony against provisions of an energy bill that would limit liability for oil companies.
- Research to support litigation to restore drinking water supplies that have been contaminated by MTBE in California and New York.

- Expert witness testimony in a case of oil production-related contamination in Mississippi.
- Lead author for a multi-volume remedial investigation report for an operating school in Los Angeles that met strict regulatory requirements and rigorous deadlines.

- Development of strategic approaches for cleanup of contaminated sites in consultation with clients and regulators.

Executive Director:

As Executive Director with Orange Coast Watch, Matt led efforts to restore water quality at Orange County beaches from multiple sources of contamination including urban runoff and the discharge of wastewater. In reporting to a Board of Directors that included representatives from leading Orange County universities and businesses, Matt prepared issue papers in the areas of treatment and disinfection of wastewater and control of the discharge of grease to sewer systems. Matt actively participated in the development of countywide water quality permits for the control of urban runoff and permits for the discharge of wastewater. Matt worked with other nonprofits to protect and restore water quality, including Surfrider, Natural Resources Defense Council and Orange County CoastKeeper as well as with business institutions including the Orange County Business Council.

Hydrogeology:

As a Senior Hydrogeologist with the U.S. Environmental Protection Agency, Matt led investigations to characterize and cleanup closing military bases, including Mare Island Naval Shipyard, Hunters Point Naval Shipyard, Treasure Island Naval Station, Alameda Naval Station, Moffett Field, Mather Army Airfield, and Sacramento Army Depot. Specific activities were as follows:

- Led efforts to model groundwater flow and contaminant transport, ensured adequacy of monitoring networks, and assessed cleanup alternatives for contaminated sediment, soil, and groundwater.
- Initiated a regional program for evaluation of groundwater sampling practices and laboratory analysis at military bases.
- Identified emerging issues, wrote technical guidance, and assisted in policy and regulation development through work on four national U.S. EPA workgroups, including the Superfund Groundwater Technical Forum and the Federal Facilities Forum.

At the request of the State of Hawaii, Matt developed a methodology to determine the vulnerability of groundwater to contamination on the islands of Maui and Oahu. He used analytical models and a GIS to show zones of vulnerability, and the results were adopted and published by the State of Hawaii and County of Maui.

As a hydrogeologist with the EPA Groundwater Protection Section, Matt worked with provisions of the Safe Drinking Water Act and NEPA to prevent drinking water contamination. Specific activities included the following:

- Received an EPA Bronze Medal for his contribution to the development of national guidance for the protection of drinking water.
- Managed the Sole Source Aquifer Program and protected the drinking water of two communities through designation under the Safe Drinking Water Act. He prepared geologic reports, conducted public hearings, and responded to public comments from residents who were very concerned about the impact of designation.

- Reviewed a number of Environmental Impact Statements for planned major developments, including large hazardous and solid waste disposal facilities, mine reclamation, and water transfer.

Matt served as a hydrogeologist with the RCRA Hazardous Waste program. Duties were as follows:

- Supervised the hydrogeologic investigation of hazardous waste sites to determine compliance with Subtitle C requirements.
- Reviewed and wrote "part B" permits for the disposal of hazardous waste.
- Conducted RCRA Corrective Action investigations of waste sites and led inspections that formed the basis for significant enforcement actions that were developed in close coordination with U.S. EPA legal counsel.
- Wrote contract specifications and supervised contractor's investigations of waste sites.

With the National Park Service, Matt directed service-wide investigations of contaminant sources to prevent degradation of water quality, including the following tasks:

- Applied pertinent laws and regulations including CERCLA, RCRA, NEPA, NRDA, and the Clean Water Act to control military, mining, and landfill contaminants.
- Conducted watershed-scale investigations of contaminants at parks, including Yellowstone and Olympic National Park.
- Identified high-levels of perchlorate in soil adjacent to a national park in New Mexico and advised park superintendent on appropriate response actions under CERCLA.
- Served as a Park Service representative on the Interagency Perchlorate Steering Committee, a national workgroup.
- Developed a program to conduct environmental compliance audits of all National Parks while serving on a national workgroup.
- Co-authored two papers on the potential for water contamination from the operation of personal watercraft and snowmobiles, these papers serving as the basis for the development of nation-wide policy on the use of these vehicles in National Parks.
- Contributed to the Federal Multi-Agency Source Water Agreement under the Clean Water Action Plan.

Policy:

Served senior management as the Senior Science Policy Advisor with the U.S. Environmental Protection Agency, Region 9. Activities included the following:

- Advised the Regional Administrator and senior management on emerging issues such as the potential for the gasoline additive MTBE and ammonium perchlorate to contaminate drinking water supplies.
- Shaped EPA's national response to these threats by serving on workgroups and by contributing to guidance, including the Office of Research and Development publication, Oxygenates in Water: Critical Information and Research Needs.
- Improved the technical training of EPA's scientific and engineering staff.
- Earned an EPA Bronze Medal for representing the region's 300 scientists and engineers in negotiations with the Administrator and senior management to better integrate scientific principles into the policy-making process.
- Established national protocol for the peer review of scientific documents.

Geology:

With the U.S. Forest Service, Matt led investigations to determine hillslope stability of areas proposed for timber harvest in the central Oregon Coast Range. Specific activities were as follows:

- Mapped geology in the field, and used aerial photographic interpretation and mathematical models to determine slope stability.
- Coordinated his research with community members who were concerned with natural resource protection.
- Characterized the geology of an aquifer that serves as the sole source of drinking water for the city of Medford, Oregon.

As a consultant with Dames and Moore, Matt led geologic investigations of two contaminated sites (later listed on the Superfund NPL) in the Portland, Oregon, area and a large hazardous waste site in eastern Oregon. Duties included the following:

- Supervised year-long effort for soil and groundwater sampling.
- Conducted aquifer tests.
- Investigated active faults beneath sites proposed for hazardous waste disposal.

Teaching:

From 1990 to 1998, Matt taught at least one course per semester at the community college and university levels:

- At San Francisco State University, held an adjunct faculty position and taught courses in environmental geology, oceanography (lab and lecture), hydrogeology, and groundwater contamination.
- Served as a committee member for graduate and undergraduate students.
- Taught courses in environmental geology and oceanography at the College of Marin.

Matt taught physical geology (lecture and lab and introductory geology at Golden West College in Huntington Beach, California from 2010 to 2014.

Invited Testimony, Reports, Papers and Presentations:

Hagemann, M.F., 2008. Disclosure of Hazardous Waste Issues under CEQA. Presentation to the Public Environmental Law Conference, Eugene, Oregon.

Hagemann, M.F., 2008. Disclosure of Hazardous Waste Issues under CEQA. Invited presentation to U.S. EPA Region 9, San Francisco, California.

Hagemann, M.F., 2005. Use of Electronic Databases in Environmental Regulation, Policy Making and Public Participation. Brownfields 2005, Denver, Coloradao.

Hagemann, M.F., 2004. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in Nevada and the Southwestern U.S. Presentation to a meeting of the American Groundwater Trust, Las Vegas, NV (served on conference organizing committee).

Hagemann, M.F., 2004. Invited testimony to a California Senate committee hearing on air toxins at schools in Southern California, Los Angeles.

Brown, A., Farrow, J., Gray, A. and **Hagemann, M.**, 2004. An Estimate of Costs to Address MTBE Releases from Underground Storage Tanks and the Resulting Impact to Drinking Water Wells. Presentation to the Ground Water and Environmental Law Conference, National Groundwater Association.

Hagemann, M.F., 2004. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in Arizona and the Southwestern U.S. Presentation to a meeting of the American Groundwater Trust, Phoenix, AZ (served on conference organizing committee).

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in the Southwestern U.S. Invited presentation to a special committee meeting of the National Academy of Sciences, Irvine, CA.

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River. Invited presentation to a tribal EPA meeting, Pechanga, CA.

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River. Invited presentation to a meeting of tribal repesentatives, Parker, AZ.

Hagemann, M.F., 2003. Impact of Perchlorate on the Colorado River and Associated Drinking Water Supplies. Invited presentation to the Inter-Tribal Meeting, Torres Martinez Tribe.

Hagemann, M.F., 2003. The Emergence of Perchlorate as a Widespread Drinking Water Contaminant. Invited presentation to the U.S. EPA Region 9.

Hagemann, M.F., 2003. A Deductive Approach to the Assessment of Perchlorate Contamination. Invited presentation to the California Assembly Natural Resources Committee.

Hagemann, M.F., 2003. Perchlorate: A Cold War Legacy in Drinking Water. Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. From Tank to Tap: A Chronology of MTBE in Groundwater. Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. A Chronology of MTBE in Groundwater and an Estimate of Costs to Address Impacts to Groundwater. Presentation to the annual meeting of the Society of Environmental Journalists.

Hagemann, M.F., 2002. An Estimate of the Cost to Address MTBE Contamination in Groundwater (and Who Will Pay). Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. An Estimate of Costs to Address MTBE Releases from Underground Storage Tanks and the Resulting Impact to Drinking Water Wells. Presentation to a meeting of the U.S. EPA and State Underground Storage Tank Program managers.

Hagemann, M.F., 2001. From Tank to Tap: A Chronology of MTBE in Groundwater. Unpublished report.

Hagemann, M.F., 2001. Estimated Cleanup Cost for MTBE in Groundwater Used as Drinking Water. Unpublished report.

Hagemann, M.F., 2001. Estimated Costs to Address MTBE Releases from Leaking Underground Storage Tanks. Unpublished report.

Hagemann, M.F., and VanMouwerik, M., 1999. Potential Water Quality Concerns Related to Snowmobile Usage. Water Resources Division, National Park Service, Technical Report.

VanMouwerik, M. and **Hagemann, M.F**. 1999, Water Quality Concerns Related to Personal Watercraft Usage. Water Resources Division, National Park Service, Technical Report.

Hagemann, M.F., 1999, Is Dilution the Solution to Pollution in National Parks? The George Wright Society Biannual Meeting, Asheville, North Carolina.

Hagemann, M.F., 1997, The Potential for MTBE to Contaminate Groundwater. U.S. EPA Superfund Groundwater Technical Forum Annual Meeting, Las Vegas, Nevada.

Hagemann, M.F., and Gill, M., 1996, Impediments to Intrinsic Remediation, Moffett Field Naval Air Station, Conference on Intrinsic Remediation of Chlorinated Hydrocarbons, Salt Lake City.

Hagemann, M.F., Fukunaga, G.L., 1996, The Vulnerability of Groundwater to Anthropogenic Contaminants on the Island of Maui, Hawaii. Hawaii Water Works Association Annual Meeting, Maui, October 1996.

Hagemann, M. F., Fukanaga, G. L., 1996, Ranking Groundwater Vulnerability in Central Oahu, Hawaii. Proceedings, Geographic Information Systems in Environmental Resources Management, Air and Waste Management Association Publication VIP-61.

Hagemann, M.F., 1994. Groundwater Characterization and Cleanup at Closing Military Bases in California. Proceedings, California Groundwater Resources Association Meeting.

Hagemann, M.F. and Sabol, M.A., 1993. Role of the U.S. EPA in the High Plains States Groundwater Recharge Demonstration Program. Proceedings, Sixth Biennial Symposium on the Artificial Recharge of Groundwater.

Hagemann, M.F., 1993. U.S. EPA Policy on the Technical Impracticability of the Cleanup of DNAPL-contaminated Groundwater. California Groundwater Resources Association Meeting.

Hagemann, M.F., 1992. Dense Nonaqueous Phase Liquid Contamination of Groundwater: An Ounce of Prevention... Proceedings, Association of Engineering Geologists Annual Meeting, v. 35.

Other Experience:

Selected as subject matter expert for the California Professional Geologist licensing examination, 2009-2011.

CENTER ON RACE, POVERTY & THE ENVIRONMENT

1012 Jefferson Street, Delano, CA 93215 tel 661-720-9140 fax 661-720-9483

www.crpe-ej.org

August 29, 2024

Via Email
Kern County Planning and Natural Resources Department
Attn: Katrina Slayton, Division Chief
Slaytonk@kerncounty.com
2700 M Street, Suite 100
Bakersfield, CA 93301

Re: Comments on Draft Environmental Impact Report for Proposed Malibu Vineyards Industrial Parkway Project

Dear Ms. Slayton:

The Center on Race, Poverty & the Environment submits these comments on behalf of itself, Committee for a Better Arvin, Committee for a Better Shafter, Delano Guardians, and the Comite Progreso de Lamont. The Draft Environmental Impact Report ("DEIR") for this project does not comply with the California Environmental Quality Act ("CEQA") and violates state civil rights law. The Draft EIR, with its incomplete and inconsistent analysis and conclusions, does not provide a sufficient basis on which to conclude that the Malibu Vineyards Industrial Parkway project (the "Project") will not pose a serious risk to already-vulnerable communities in Kern County. We are concerned that the Project, if approved, would be likely to cause long-term harm on communities like Shafter, Cherokee Strip, the Mexican Colony, and other similar communities. Further, without a serious evaluation of impacts, approval of this Project would be short-sighted and blind to those long-term harms.

The Legislature enacted CEQA to protect the environment and environmental health of Californians, create and maintain ecological and economic sustainability, and to "take all action necessary to protect, rehabilitate, and enhance the environmental quality of the State."[1] The purpose of an EIR is to identify significant impacts, mitigation measures, and alternatives to projects before approval, in order to serve as an "alarm bell" to the public, impacted communities, and decision-makers of

[1] *Id.*, at §§ 21000 (a), (b), (d), (g); 21001 (a), (b), (e).

irreversible environmental impacts "before they have reached ecological points of no return."[2] Each public agency must mitigate or avoid the significant effects on the environment of projects that it carries out or approves whenever feasible.[3]

The County has failed to take the "hard look" at the impacts of the Project as required by CEQA and as a result has failed to describe the environmental setting, the whole of the action, or the full scope of adverse significant impacts. Furthermore, many proposed mitigation measures are vague and unenforceable or simply fail to mitigate the effects on the environment and health. Lastly, the County failed to consider a range of reasonable alternatives. As a result, the Draft EIR fails as a "document of accountability"[4] for the public and decision-makers, requiring that the County recirculate an updated draft with a complete evaluation of the Project impacts, as well as additional mitigation measures and alternatives analysis. [5]

The County should also translate the DEIR or at very least the executive summary into Spanish and hold a public hearing ahead of the close of the public comment period for the recirculated draft to allow additional opportunity for public input.

In addition to this letter, we have made available documents relied upon by these comments in this folder:
https://drive.google.com/drive/folders/1dBbSYVi5lRiHbgtESSP9PSNKvdZy1X3V?usp=sharing.
If you cannot access the folder, please contact Natalia Ospina at nospina@crpe-ej.org.

[2] *Id*., at § 21002.1(a); *County of Inyo v. Yorty* (1973) 32 Cal.App.3d 795, 810.
[3] Pub. Res. Code § 21002.1(b).
[4] *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 512, citing *Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376, 392 ("Because the EIR must be certified or rejected by public officials, it is a document of accountability. If CEQA is scrupulously followed, the public will know the basis on which its responsible officials either approve or reject environmentally significant action, and the public, being duly informed, can respond accordingly to action with which it disagrees."
[5] "[R]ecirculation is required, for example, when the new information added to an EIR discloses: (1) a new substantial environmental impact resulting from the project or from a new mitigation measure proposed to be implemented; (2) a substantial increase in the severity of an environmental impact unless mitigation measures are adopted that reduce the impact to a level of insignificance; (3) a feasible project alternative or mitigation measure that clearly would lessen the environmental impacts of the project, but which the project's proponents decline to adopt; or (4) that the draft EIR was so fundamentally and basically inadequate and conclusory in nature that public comment on the draft was in effect meaningless." *Laurel Heights Improvement Assn. v. Regents of University of California* (1993) 6 Cal.4th 1112, 1130, citing CEQA Guidelines § 15162; *Mountain Lion Coalition v. Fish & Game Com.* (1989) 214 Cal.App.3d 1043.

TABLE OF CONTENTS

I. THE COUNTY FAILS TO CONSIDER ENVIRONMENTAL JUSTICE IMPACTS 4

II. THE COUNTY FAILS TO CONSIDER KEY IMPACTS, MITIGATION MEASURES, AND ALTERNATIVES DUE TO AN IMPROPER AND INCOMPLETE PROJECT DESCRIPTION 6

A. Draft EIR Fails to Consider True Whole of the Action 6

B. Draft EIR Fails to Adequately Discuss Environmental Setting and Baseline. 7

i. The DEIR fails to describe current and accurate existing environmental conditions regarding pesticides 7

ii. The DEIR fails to describe current and accurate existing air and water contamination in the surrounding area from freight, agricultural, and oil and gas industries 7

III. THE COUNTY HAS NOT ADEQUATELY ANALYZED CUMULATIVE IMPACTS 9

IV. THE COUNTY DOES NOT ADEQUATELY ANALYZE THE ENVIRONMENTAL AND HEALTH IMPACTS OF THIS PROJECT 13

A. Air Quality Impacts 14

i. The DEIR's Air Quality Impact Analysis is Incomplete and Inaccurate 15

ii. Mitigation Analysis 18

iii. Cumulative Analysis 19

iv. Discussion of Health Effects 20

v. Failure to Comply with All Applicable Standards 21

B. The County Does Not Adequately Analyze Transportation and Traffic Impacts 22

i. Reliance on Incomplete Traffic Study 22

ii. Inadequate VMT analysis 23

C. Water Quality and Supply Impacts 31

D. Greenhouse Gas Emissions 32

E. Hazards and Hazardous Materials 33

i. Pesticide Use 33

ii. General Plan Consistency 33

F. Growth-Inducing Impacts 34

G. Biological Resources 34

H. Aesthetics Impact 35

V. THE COUNTY HAS NOT INCLUDED ALL FEASIBLE MITIGATION MEASURES 36

A. Air Quality Mitigation Measures 36

B. Water Quality and Supply Mitigation Measures 37

i. Groundwater Mitigation Measures 37

i. Flood Prevention Mitigation Measure 38

C. Transportation Mitigation Measures 39

D. Additional General Mitigation Measures 40

E. The EIR must Discuss the Impact of Mitigation Measures 41

VI. THE COUNTY HAS NOT ADEQUATELY ANALYZED ALTERNATIVES 41

VII. THE DRAFT EIR PRECLUDES MEANINGFUL PUBLIC REVIEW 43

I. THE COUNTY FAILS TO CONSIDER ENVIRONMENTAL JUSTICE IMPACTS

The County ignores its obligations under CEQA and state law by failing to study or address the potential disproportionate impacts of the Project on already overburdened low-income communities and communities of color such as Shafter, Mexican Colony, Cherokee Strip, and Smith Corner.

While the majority of this letter speaks to the Draft EIR's CEQA deficiencies, we urge the County to give serious weight to its civil rights responsibilities under Government Code § 11135, which prohibits the unlawful denial of full and equal access to the benefits of, and the unlawful discrimination against under, any program or activity that receives any financial assistance from the state.[6] The County will rely on state financial assistance to develop the infrastructure necessary to sustain freight expansion projects such as this one. This assistance triggers civil rights obligations to ensure that its decisions and actions "do not result in the unmitigated concentration of polluting activities near communities that fall into the categories defined in Government Code section 11135."[7] The current Draft EIR allows for this concentration of polluting facilities in low-income communities of color in violation of state civil rights law.

Moreover, the County has not adopted an environmental justice element for either the Kern County or Metropolitan Bakersfield General Plans. Kern County claims that it will incorporate environmental justice policies throughout its 2040 General Plan, but has delayed that planned process.[8] Since Kern County has not yet updated its General Plan in compliance with SB 1000, it does not rely on established policies or goals to guide lead agencies on how to advance environmental justice and prevent disproportionate burdens environmental justice communities. Therefore, the County must take the extra step of developing project-specific environmental justice goals and strategies to guide its CEQA analysis and the development of mitigation measures and alternatives for this Project.

CEQA requires that lead agencies "[t]ake all action necessary to provide the people of this state with clean air and water, enjoyment of aesthetic, natural, scenic, and historic environmental qualities, and freedom from excessive noise."[9] In order to achieve this, the County must consider the impact of the Project on overburdened communities like Shafter. Shafter is likely to receive a significant amount of new truck traffic from the Project because proposed road expansions and the proposed intermodal railyard that is part of the Wonderful Industrial Park expansion. Shafter area residents already face a greater burden of exposure to ozone, fine particulate matter ("PM2.5"), and pesticides than 80% of Californians.[10] Some neighborhoods near the proposed Burbank Street expansion, such as Mexican Colony, Smith Corner, and Cherokee Strip, already experience higher levels of PM2.5 exposure than 95% of the state. They also experience higher levels of poverty, linguistic isolation, and housing burden. Shafter is also an AB 617 community, and one with the unfortunate distinction

---

[6] Gov't Code § 11135(a).
[7] California Department of Justice, Environmental Justice at the Local and Regional Level (2012) p, 1, *available at* https://oag.ca.gov/sites/all/files/agweb/pdfs/environment/ej_fact_sheet.pdf.
[8] Kern Council of Governments, General Plan Basics, *available at* https://kern2040.com/general-plan-basics.html
[9] Pub. Res. Code § 21001(b).
[10] CalEnviroScreen 4.0, https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40.

of being the only one of the ten initial communities for which the entire community, rather than a small portion of it, was determined to be both disadvantaged and disproportionately burdened by pollution. Unsurprisingly, the areas with the highest levels of pollution and socioeconomic burdens also have the highest percentage of Latine residents.

The disproportionate burden experienced by these neighborhoods in Shafter is a result of decades of racist and classist exclusionary policies. The unincorporated community of Mexican Colony was founded by Mexican migrants who were excluded from the City of Shafter. Similarly, Cherokee Strip and Smith Corner were established by poor white migrants who arrived during the Great Depression. As a result, these communities have experienced underinvestment at all levels of government and are vulnerable to the continued concentration of polluting facilities that will add to existing cumulative environmental and socioeconomic harms.

In addition to Shafter, there are other nearby low-income communities that would be disproportionately impacted by the Project, such as Oildale to the southeast. Oildale is along a likely traffic route for the Project and would probably see road widening projects to accommodate increased truck traffic. Oildale is located next to several major oil fields, already houses a refinery, and is within the 81-93 highest CalEnviroScreen percentile, with an exposure to PM2.5 already in the 99th percentile of the state. Between 87 to 96% of Oildale residents live in poverty.[11]

Directly addressing environmental justice impacts will prevent Kern County from repeating the mistakes of other regions. In the South Coast Air Basin, communities near warehouses scored higher on California's environmental justice screening tool that measures pollution and demographic vulnerability.[12] A study carried out by South Coast Air Quality Management District ("AQMD") concluded that Latine and Black residents were more likely to live near warehouses and therefore be exposed to toxic pollutants such as diesel particulate matter and suffer from higher rates of asthma, cardiovascular disease, low birth weights.[13] It also showed that communities within half a mile to 2 miles from a warehouse also had higher poverty and unemployment rates, which demonstrated that the communities most burdened by the warehouse projects were not directly benefiting from the job creation that had spurred the regional warehouse expansions in the first place.[14] A separate analysis of warehouses in the South Coast Air Basin found that the concentration of residents of color increased the shorter the distance from a warehouse.[15]

There are similar studies show how communities of color and low-income communities are impacted by vehicle pollution and proximity to highways. A study of exposure to air pollution

---

[11] CalEnviroScreen 4.0, https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40.

[12] South Coast Air Quality Management District, Final Socioeconomic Assessment for Proposed Rule 2305 – Warehouse Indirect Source Rule (May 2021), pp. 4-6.

[13] *Id.*, at pp. 5-7.

[14] *Id.*, at p. 6.

[15] Ivette Torres, et al., Warehouses, Pollution, and Social Disparities: An analytical view of the logistics industry's impacts on environmental justice communities across Southern California (April 2021), p. 16, *available at* https://www.movingforwardnetwork.com/wp-content/uploads/2023/05/Torres_Klooster_Warehouses-Pollution-and-Social-Disparities_2021.pdf.

from vehicles found that Latine Californians are exposed to 39% higher PM2.5 pollution than white Californians, and that Black Californians are exposed to 43% levels of PM2.5 than white Californians.[16]

This Project would add yet another set of burdens onto surrounding communities without any guarantee that the benefits "promised" by the Project will actually improve their quality of life. Approval of the Project describe in the Draft EIR violated CEQA standards and state civil rights laws.

II. THE COUNTY FAILS TO CONSIDER KEY IMPACTS, MITIGATION MEASURES, AND ALTERNATIVES DUE TO AN IMPROPER AND INCOMPLETE PROJECT DESCRIPTION

A. Draft EIR Fails to Consider True Whole of the Action

An EIR must "include[] sufficient detail to enable those who did not participate in its preparation to understand and to consider meaningfully the issues the proposed project raises."[17] Lead agencies must evaluate "the whole of the action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment."[18] In order to avoid the illegal piecemealing of project analysis, agencies must include analysis of future expansions if 1) it is a reasonably foreseeable consequence of the project, and 2) the future expansion will change the scope or nature of the initial project or its environmental effects.[19]

Kern County has not considered the "whole of the action" by failing to analyze related expansion projects that will significantly alter the nature and scope of this Project. This Project is a component of a wider set of freight expansion projects that will significantly shift the character of the surrounding area (including in the City of Shafter) and result in freight-related impacts on health, air quality, water quality and supply, noise, lighting, traffic, safety, and climate, among others. Therefore, the Draft EIR must look at the foreseeable environmental impacts of expanded industrial use on this property as well as in the broader region as more agricultural land is converted to industrial logistics use.

As part of this broader analysis, the County must specifically evaluate the impacts from the Burbank Street expansion and interchange because Phase 2 of the Project relies on its

[16] Inequitable Exposure to Air Pollution from Vehicles in California, Union of Concerned Scientists (2019), *available at* https://www.ucsusa.org/resources/inequitable-exposure-air-pollution-vehicles-california-2019.
[17] *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 510, citing *Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376, 405. "An accurate project description is "the sine qua non of an informative and legally sufficient" CEQA document. *Cty. of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 199; see also CEQA Guidelines § 15124.
[18] CEQA Guidelines § 15378(a).
[19] *Banning Ranch Conservancy v. City of Newport Beach* (2012) 211 Cal.App.4th 1209, 1222, citing *Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376.

construction.[20] Moreover, the Project's land use consistency assumes that there will be additional regional road capacity to "relieve congestion along the 7th Standard Road/Merle Haggard Drive corridor"[21] and these capacity-increasing projects should also be analyzed as part of the "whole of the action." Failure to do so would be illegal piecemealing.

Lastly, as a result of not considering the "whole of the action," the Draft EIR does not accurately identify all sensitive receptors that would be exposed to pollution generated by the Project, such as homes, schools, parks, clinics, and churches along existing and future truck routes.

A legally inadequate EIR that does not evaluate the full scope of the Project prevents informed decision-making in violation of CEQA.[22] Such is the case here. Kern County must recirculate a Draft EIR that discusses the direct, indirect and cumulative impact of future expansions that are a reasonably foreseeable consequence of the Project, such as the Burbank Street expansion.

B. Draft EIR Fails to Adequately Discuss Environmental Setting and Baseline.

CEQA requires agencies to discuss the existing environmental conditions at and near a project site, as the significance of the project's impacts will vary based on the environmental setting.[23] The Draft EIR does not adequately describe the existing conditions locally or regionally and ignores critical information about existing poor air quality, water contamination, groundwater over-drafting, hazard exposure, and other underlying environmental conditions.

i. The DEIR fails to describe current and accurate existing environmental conditions regarding pesticides

The DEIR needs to accurately describe existing environmental conditions concerning pesticide use at the project site. The DEIR states that "pesticides, herbicides, fertilizers, and general soil amendments ha[ve] been licensed for application to the proposed project from the years 1994 through 2020."[24] However, the project site is still in operation today; as of Aug. 20th, 2024, the land is still being used to grow and cultivate grapes, which indicates that pesticides, herbicides, fertilizers, and general soil amendments have been used since 2020. The DEIR, therefore, leaves out four years of data that would speak to existing environmental conditions. It is essential to provide accurate information since different applications of chemicals affect soil and can even leech into the groundwater table, which would require analysis under CEQA and additional investigation, sampling, and remediation.

ii. The DEIR fails to describe current and accurate existing air and water contamination in the surrounding area from freight, agricultural, and oil and gas industries

[20] Kern County Planning and Natural Resources Department, Draft Environmental Impact Report, Malibu Vineyards Industrial Parkway Project (July 2024), Vol. 1, p. 4.2-21 [hereinafter "DEIR"]
[21] DEIR, Vol. 1, p. 4.11-49.
[22] *Riverwatch v. Olivenhain Mun. Water Dist.* (2009) 170 Cal.App.4th 1186, 1201.
[23] *See* CEQA Guidelines § 15064(b).
[24] DEIR, Vol. 3, Appendix J, p. 25, Table 3-5.

The environmental setting described in the Draft EIR is incomplete because it does not provide sufficient detail about the existing levels of contamination that existing in the surrounding environment and that nearby communities are exposed to. The County must update its environmental setting discussion and recirculate to comply with CEQA. This discussion must include, but is not limited to:

- Existing levels of air pollution. The Project site is located in a census tract that is in the 88th percentile of pollution burden in the state.[25] This includes some of the highest levels of PM2.5, (98%), ozone (85%), pesticides (95%), and hazardous waste expose (82%) in California.
- Existing levels of drinking water, groundwater, and surface water contamination.[26] The Project site is located in a census tract with some of the highest drinking water contamination levels (97%). The contaminants found in drinking water in this tract include 1,2,3-TCP, arsenic, nitrate, hexavalent chromium, DBCP, haloacetic acids, lead, copper, perchlorate, PCE, and coliform (indicator for wastewater contamination). According to the California Water Board Groundwater Infiltration System (GAMA), as of 2022 and 2023, the Project site contains one domestic water well tested positive for nitrites and nitrates that are not accounted for in the DEIR.[27] This data indicates that water present within the project site boundary may contain nitrites and nitrates, and it must be disclosed and analyzed within the DEIR.
- Groundwater supply. Given that the Project will be adding impervious surfaces, it is important to describe the environmental setting of the current groundwater overdrafting and efforts at groundwater retainment and recharge.
- Pesticide use.[28] The Project will be surrounded by agricultural use and so the level and types of pesticide use is critical to an accurate discussion of the environmental setting. The pesticides with the highest use the census tract that the Project sits on are 1,3-D (telone), paraquat dichloride, potassium n-methyldithiocarbamate, chloropicrin, andchlorothalonil.
- A clear and accessible description of existing traffic patterns, including formal and informal truck routes. The Draft EIR must lay out an accurate baseline for traffic, especially for trucks. The traffic study relied on by the Draft EIR for its transportation and traffic impact conclusions and mitigation measures is insufficient to communicate the required environmental setting as it is missing key information (including how much of existing traffic is truck traffic) and what information is provided is hidden within the appendix of an appendix.

[25] CalEnviroScreen 4.0 Indicator Map, available here.
[26] *Ibid*.
[27] California Water Board GIS GAMA Dataset, https://gamagroundwater.waterboards.ca.gov/gama/gamamap/public/GamaDataDisplay.asp?dataset=AGLAND&samp_date=&global_id=AGW080022634&assigned_name=RCH10WELL&store_num=#.
[28] *Ibid.*

III. THE COUNTY HAS NOT ADEQUATELY ANALYZED CUMULATIVE IMPACTS

CEQA requires agencies to study any cumulative impacts from a project.[29] Significant cumulative impacts occur "as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts" where the "incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects."[30] Even relatively small impacts may be significant if they contribute to a larger environmental problem.[31] While perfection is not required, an agency must conduct a cumulative impact analysis that is adequate, complete, and makes a good faith effort at full disclosure.[32]

A cumulative impact analysis must contain, at minimum, either a list of past, present, and reasonably anticipated future projects (including those projects outside the agency's control produce related or cumulative impacts) or a summary of such projections contained in an adopted general plan or related planning document which evaluates regional or areawide conditions.[33] If the severity and significance of cumulative impacts cannot be adequately reflected without the inclusion of a project, it should be part of a lead agency's cumulative impact analysis.[34] Agencies must consider severity of impacts and likelihood of occurrence when considering which cumulative impact projects to include in a draft EIR.[35] CEQA suggests that agencies look at factors such as the nature of the environmental resource examined, location of project, and type.[36] The failure to include a complete list of projects that produce related or cumulative impacts is a violation of CEQA and requires recirculation of the Draft EIR.

The County prepared a list of projects that would cause similar cumulative impacts within a 1-mile and 6-mile perimeter. The County's use of a 1-mile and 6-mile perimeter[37] is arbitrary and results in an incomplete analysis given the interconnected nature of the goods movement system. Here, Kern County omits several goods movement projects that would generate similar impacts to the proposed Project and because of this omission the County has not adequately considered the cumulative impact of the Project.

---

[29] CEQA Guidelines § 15130(a) ("An EIR shall discuss cumulative impacts of a project when the project's incremental effect is cumulatively considerable. . ."); see also § 15065(a)(3).
[30] *Id.*, §§ 15130(a)(1); 15065(a)(3); *Envtl. Protection Info. Ctr. V. Cal. Dept. of Forestry and Fire Protection* (2008) 44 Cal.4th 459, 523.
[31] *San Francisco Baykeeper, Inc. v. State Lands Comm'n* (2015) 242 Cal.App.4th 202, 223 ("In fact, the greater the existing environmental problems are, the lower the threshold should be for treating a project's contribution to cumulative impacts as significant." (citation omitted)).
[32] *Mountain Lion Coalition v. Fish & Game Com.* (1989) 214 Cal.App.3d 1043, 1052, citing CEQA Guidelines, § 15151.
[33] CEQA Guidelines, § 15130(b)(1).
[34] *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 723.
[35] CEQA Guidelines, § 15130(b).
[36] *Id.*, § 15130(b)(2).
[37] DEIR, Vol. 1, p. 3-60.

Agencies have the discretion to determine the assessment area, but they cannot make that decision arbitrarily and it should be informed by their technical expertise.[38] In this case, the County provided no evidence for why six miles is an appropriate distance to use when measuring cumulative impacts on the environment and health. While it might be a reasonable assessment area for some projects, this Project will result in an increase in truck (and, indirectly, rail) traffic throughout the county, making six miles an arbitrary cut off that leaves out freight projects that will cumulatively contribute to increased adverse impacts on communities like Shafter. Therefore, the County should prepare a project list based on similar impacts to the project to the same communities that would be impacted by the proposed Project, not an arbitrary 6-mile perimeter. To the extent that the County justifies and relies on a perimeter approach, it must define the perimeter to include all communities along the major truck and rail routes that would serve the Project and consider impacts within that perimeter from projects outside that perimeter, such as other warehouse projects that likewise increase truck and rail traffic in the same impacted communities.

The exclusion of past, present, and reasonably foreseeable future projects that contribute or would contribute to cumulative adverse impacts on the environment and surrounding communities is especially problematic because of the Project's environmental setting, discussed in more detail in the previous section. The DEIR must identify and describe all projects that will have similar impacts on the environment and include them in the cumulative project section. For freight projects, this should include an impact analysis of air quality and health based the type and age of freight truck and locomotives expected to visit the sites, as well as noise, light, and safety impacts (including the impacts from long idling trains).

While this is not intended to be an exhaustive list, the following projects must be considered by the County in its cumulative impact analyses:

- **Warehouse Projects:** The Draft EIR cumulative project list includes at least four industrial and logistics warehouse projects: the Wonderful Industrial Park Expansion, the Rosedale Ranch Trade and Transportation Park, the Bakersfield 239 Industrial Project, and the IPG Industrial Project.[39] However, there are several projects missing from the list, such as:
    - Highway 46 Logistics Center, to be located near Lost Hills;[40]
    - Westside Industrial Park project, to be located in Bakersfield;[41]

[38] *Ebbetts Pass Forest Watch v. Department of Forestry & Fire Protection* (2004) 123 Cal.App.4th 1331, 1351.
[39] DEIR, Vol. 1, p. 3-62.
[40] Kern County Planning and Natural Resources Department, Highway 46 Warehouse Project, *available at* https://kernplanning.com/environmental-doc/highway-46-warehouse-project/.
[41] Kern County Planning and Natural Resources Department, Westside Industrial Project, *available at* https://kernplanning.com/environmental-doc/westside-industrial-project/. The DEIR released for public comment in June 2024.

- Amazon Fulfillment Center BFL1, located in Bakersfield near Meadows Field Airport;[42]
- Cal Centre Project, to be located in Buttonwillow along 7th Standard Road;[43]
- A 73,000 square-foot warehouse under construction near the Meadows Field Airport;[44]
- Houghton Industrial Park;[45] and
- Other distribution centers and manufacturing facilities in Kern County.[46]

- **Road Projects:**
  - Highway Interchange Projects: Several interchange expansions (including at least one new interchange) are referenced in the traffic study and planning documents developed by Kern Council of Governments ("KCOG"). These include adding 2 lanes on Lerdo Highway and SR-99 ramps,[47] adding 3 lanes to the intersection of Golden State Highway and 7th Standard,[48] an eastbound bridge replacement and new ramps at the 7th Standard Rd and SR-99 interchange,[49] and constructing at least one entirely new interchange near Burbank St. and SR-99.[50] Construction on the 7th Standard Rd. and SR-99 bridge replacement and new ramps is expected be complete by 2030, per the completed environmental document.[51]
  - Burbank Street: DEIR explains that Phase 2 of the project relies on a Burbank Street expansion, which "would provide a buffer on the north side of Phase 1" and is intended to address issues of on-site circulation and parking, site access, and mitigation stating.[52] However, the expansion of Burbank Street is not mentioned in the cumulative analysis, although it is addressing a cumulative impact.
  - Road widenings: Some projects are referenced in the traffic study, such as the 1-lane widening of 7th Standard Rd. from Calloway Dr. to Quinn Rd., the 2-lane widening of Merle Haggard Dr. from Landings Way to Airport Dr,[53] and the reconstruction of 7th Standard Rd and the 7th Standard/SR-99 interchange from the Beardsley Canal to east of SR-99 as a result of the High Speed Rail segment.[54]

---

[42] *Kern County is poised to become warehousing's next frontier*, Los Angeles Times (Dec. 19, 2023), *available at* https://www.latimes.com/california/story/2023-12-19/kern-county-california-warehouse-industry-next-frontier?utm_source=yahoo&utm_medium=promo_module&utm_campaign=rss_feed.
[43] Kern County Planning and Natural Resources Department, Staff Report for Cal Centre Warehouse Project (Sept. 26, 2023), *available here.*
[44] *Kern County is poised to become warehousing's next frontier*, Los Angeles Times (Dec. 19, 2023).
[45] Kern County, Planning and Natural Resources Department, 99 Houghton Industrial Park Project, *available at* https://kernplanning.com/environmental-doc/99-houghton/.
[46] Kern COG compiled a map of the 50 largest distribution centers in its KARGO II study. Kern Council of Governments, Kern Area Regional Goods-Movement Operations (KARGO) Sustainability Study Phase II (June 2023), p. 9 [hereinafter "KARGO study"].
[47] DEIR, Vol. 3, Appendix L, p. 37; see also Kern Council of Governments, Long Range Transportation Plan Project Listing Revisions Summary (Nov. 1, 2023), p. 21 [hereinafter "KCOG Draft Project List"].
[48] DEIR, Vol. 3, Appendix L, p. 37.
[49] *Id.*, at Vol. 3, Appendix L, p. 36; Vol. 1, p. 4.16-17; see also KCOG Draft Project List, at p. 21.
[50] DEIR, Vol. 1, p. 4.16-16.
[51] *Id.*, at Vol. 3, Appendix L, p. 36; *id.*, at Vol .1, p. 4.16-17.
[52] *Id.*, at Vol. 1, p. 4.2-21.
[53] *Id.*, at Vol. 3, Appendix L, p. 38
[54] *Id.*, at Vol. 1, p. 4.16-17.

The KCOG has also prepared a draft 2026 Regional Transportation Plan ("RTP") project list that includes projects that would have similar adverse impacts as this project.[55] While we recognize this is draft list of projects, the County should identify those within the list that are reasonably anticipated and should be included in a cumulative projects list.

- New highways: There are also references in KCOG planning documents and by other developers of a new highway project near Shafter that is intended to reduce congestion along SR-99.[56]
- Existing highways: The past and existing impacts from nearby highways (SR-99, SR-65, Lerdo Highway and 7th Standard) must also be incorporated into the Draft EIR's cumulative analyses.

- **Freight Railyards and Rail Facilities**: While the Draft EIR makes no references in its cumulative impacts analysis to existing or proposed intermodal railyards or inland port projects, the plans for goods movement investments in Kern often assume an increased reliance on intermodal railyards and associated container yards.[57] This would also be the case for the Project, which would be located across the SR-99 from the Union Pacific rail line and within 6 miles of the BNSF rail line.[58] Freight rail has severe impacts on nearby communities, including worsened air pollution and greenhouse gas emissions and increased cancer risk.[59] As a result, the County must discuss past, present, and future rail projects and increased freight rail traffic in its cumulative analysis, including, but not limited to the:
  - Shafter Rail Terminal;[60]
  - Wonderful Intermodal Rail Facility in Shafter along the BNSF rail line;[61]
  - Intermodal Rail Facility, Phase 3, in Shafter/Bakersfield;[62] and

[55] KCOG Draft Project List.
[56] See, e.g, KARGO Study, Appendix A1 – ROW Footprints for Specific Plan Line Adoption, Location 10 – North Beltway between Cherry Ave West Beltway; *California's wealthiest farm family plans mega-warehouse complex that would reshape Kern economy*, Los Angeles Times (May 8, 2024), *available at* https://www.latimes.com/california/story/2024-05-08/resnick-wonderful-mega-warehouse-kern-county ("Wonderful is also touting plans for a six-lane highway, the Central Valley Green Pass, that would act as a relief valve for Highway 99.").
[57] See, e.g., KARGO Study; California Inland Port Feasibility Analysis, Preliminary Business Model (April 2020).
[58] California State Geoportal, California Rail Network, *available* here.
[59] Trade, Health, and Environment (THE) Impact Project, Tracking Harm: Health and Environmental Impacts of Rail Yards (June 2012), p. 4, *available at* https://envhealthcenters.usc.edu/wp-content/uploads/2016/11/Tracking-Harm.pdf; *Long-idling trains create health, environmental concerns nationwide*, InvestigateTV (Feb. 26, 2024), *available at* https://www.investigatetv.com/2024/02/26/long-idling-trains-create-health-environmental-concerns-nationwide/.
[60] City of Shafter, Shafter Rail Terminal, https://www.shafter.com/319/Shafter-Rail-Terminal.
[61] *California's wealthiest farm family plans mega-warehouse complex that would reshape Kern economy*, Los Angeles Times (May 8, 2024). ("The company envisions building the Wonderful Pacific Terminal at the industrial park, so that trains can ferry cargo from California ports directly to the facility. Once built, Guinn estimates that 20% of imported containers could arrive by rail, with each train replacing the equivalent of 240 trucks.")
[62] KCOG Draft Project List, at p. 20.

- Cherry/7th Standard Intermodal Freight Hub Connector Improvements with construction to start in 2027.[63]

- **Other nearby facilities with similar impacts**:
  - Three Brand Cattle Co.: This facility produces air pollution (including methane and other greenhouse gas emissions) and water pollution.
  - Carceral facilities: The Lerdo Pre-Trial Facility, Lerdo Maximum-Medium Facility, and other facilities associated with the carceral state are located nearby near Lerdo Highway and Industrial Farm Rd. The traffic associated with these facilities must be considered as part of the environmental setting for the Project.
  - High-Speed Rail: The high-speed rail line will also pass near the Project and through many communities that would experience Project impacts. The County must consider how the construction and operation of the high-speed rail will cumulatively impact traffic, noise, aesthetics, and air quality.
  - Concentration of industrial facilities at Lerdo Highway and SR-99: There is a concentration of industrial facilities along the west side of SR-99 on either side of Lerdo Highway. These include two facilities with formal U.S. EPA enforcement actions within the last five years (GAF Building Materials[64] and Elk Corporation of Texas[65]). The cumulative air, water, traffic, and noise impacts from these existing facilities must be considered by the County.
  - Oil and gas extraction: There is significant oil and gas extraction, refining and process along SR-65 near the Kern Front, Kern River, and Poso Creek Oil Fields. The air and water pollution from the extraction and processing activities must be considered in this Draft EIR.
  - Industrial Agriculture: Much of the surrounding area is used for industrial agriculture, which generates air and water contamination through pesticide use and fugitive dust during harvesting and is a major contributor to groundwater over-drafting. The Draft EIR must consider these impacts in its cumulative impacts analysis.
  - Airports: Meadows Field Airport and Minter Field Airport are within 2 and 4 miles, respectively, of the Project site. The noise, lighting and air quality impacts from both airports must be cumulatively considered with the Project impacts.

IV. THE COUNTY DOES NOT ADEQUATELY ANALYZE THE ENVIRONMENTAL AND HEALTH IMPACTS OF THIS PROJECT

CEQA mandates that "[a]n EIR should be prepared with a sufficient degree of analysis to provide decisionmakers with information which enables them to make a decision which intelligently takes account of environmental consequences."[66] An adequate discussion of adverse

[63] *Id.*, at p. 21.
[64] U.S. EPA, Enforcement and Compliance History Online, Detail Facility Report: GAF Building Materials, https://echo.epa.gov/detailed-facility-report?fid=110008062149.
[65] U.S. EPA, Enforcement and Compliance History Online, Detail Facility Report: Elk Corporation of Texas, https://echo.epa.gov/detailed-facility-report?fid=110020516958.
[66] *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 712, citing CEQA Guidelines, § 15151; see also CEQA Guidelines § 15201 (stating that the "purpose of an environmental

environmental and health impacts is necessary to inform an agency's discussion of mitigation measures and alternatives.[67]

In this case, the major gaps in the Draft EIR "deprive[] the public and decision makers of substantial relevant information about the project's likely adverse impacts" and "the conclusions, determinations and methodology used to study this impact were not supported by substantial evidence in the record."[68] As a result, the DEIR does not reflect the full Project impact, resulting in a deficient document under CEQA requiring recirculation of an updated EIR pursuant to Public Resources Code § 21092.1.

A. Air Quality Impacts

The San Joaquin Valley Air Basin is in nonattainment for criteria pollutants such as ozone and PM2.5.[69] The Valley is an extreme nonattainment area for the 1997 and 2008 8-Hour Ozone National Ambient Air Quality Standards ("NAAQS"), a serious nonattainment area for the 1997 PM2.5 NAAQS, and a moderate nonattainment area for the 2006 PM2.5 NAAQS.[70] The Air Basin is also in nonattainment status for California Ambient Air Quality standards ("CAAQS") for ozone, PM2.5 and PM10.[71]

Kern County is consistently in the American Lung Association's top-ranking counties for particulate matter and ozone pollution.[72] In 2024, the City of Bakersfield was ranked worst in the nation for year-round and short-term particle pollution[73] and Kern County received a failing air quality grade for both ozone and particle pollution[74]. Despite the Draft EIR's statement that there will be significant air quality impacts, the County has severely underestimated the amount of those impacts and therefore has not proposed adequate mitigation for those impacts. This is especially concerning given the steep increase in air pollution in communities that have experienced a similar explosion in freight projects like San Bernardino County, which saw a jump in unhealthy air days from 15% to

---

impact report is to provide public agencies and the public in general with detailed information about the effect which a proposed project is likely to have on the environment") and *County of Butte v. Department of Water Resources* (2022) 13 Cal.5th 612, 627.

[67] *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 514.

[68] See *Tiburon Open Space Committee v. County of Marin* (2022) 78 Cal.App.5th 700, 755, citing *Neighbors for Smart Rail v. Exposition Metro Line Construction Authority* (2013) 57 Cal.4th 439, 463; see also, CEQA Guidelines, § 15151.

[69] California Nonattainment/Maintenance Status for Each County by Year for All Criteria Pollutants, Environmental Protection Agency; https://www3.epa.gov/airquality/greenbook/anayo_ca.html

[70] U.S. EPA, Green Book, Current Nonattainment Counties for All Criteria Pollutants, https://www3.epa.gov/airquality/greenbook/ancl.html;

[71] California Air Resources Board, Maps of State and Federal Area Designations, https://ww2.arb.ca.gov/resources/documents/maps-state-and-federal-area-designations.

[72] American Lung Association, State of the Air, *available at* http://www.stateoftheair.org.

[73] American Lung Association, State of the Air, Most Polluted Cities, https://www.lung.org/research/sota/city-rankings/most-polluted-cities.

[74] American Lung Association, State of the Air, California: Kern, https://www.lung.org/research/sota/city-rankings/states/california/kern.

20% in just one year.[75] Average asthma and cardiovascular disease rates near warehouses are higher than the state average in the South Coast Air Basin.[76] Given the existing air quality problems and nonattainment in this region, any proposed increase in air pollution must be analyzed closely and rejected if it will worsen air quality.

i. The DEIR's Air Quality Impact Analysis is Incomplete and Inaccurate

In the Air Quality section of the DEIR, the analysis is incomplete and inconsistent. These holes in the data upon which the Draft EIR relies result in the failure to fully inform the public or governing agencies of the project and additionally lead to subsequent inaccurate or unclear analysis.

1. Ambient Air Quality Analysis

An ambient air quality analysis ("AAQA") was conducted to determine the proposed Project's short-term and long-term effects on air quality.[77] It states, "most mobile emissions predicted by CalEEMod would occur beyond the project boundary due to vehicle trips."[78] Despite this conclusion, the analysis focuses on on-site emissions. This is improper, as CEQA is "designed to measure all project-related pollution emissions and prohibits the division of a project into parts for purposes of review."[79]

First, the AAQA is incomplete. The analysis was done utilizing receptor points and in part by calculating the onsite average trip distance. The number of vehicles utilized in these calculations is not stated.[80] The DEIR goes on to state, "[f]or each pollutant and averaging period modeled, a "total" concentration was estimated by adding the maximum measured background air concentration to the maximum predicted project impacts."[81] It is not explained how the projected project impacts were calculated. The monitors only obtained information on existing air quality. Additionally, it is not explained over what dates or time periods this data was collected, if there was vehicle travel at the time, wind patterns, etc. The DEIR concludes that total mobile emissions were reduced by 96.81% according to the modeling but does not explain how it reached that conclusion.[82] The County must explain its methodology, and its choice to simply state the results of an opaque analysis violates the letter and spirit of CEQA, undermines the ability of community members to assess the analysis, and reveals a disregard for informed decision-making.

---

[75] *California warehouse boom comes with health, environmental costs for Inland Empire residents*, CalMatters (Jan. 26, 2023), *available at* https://calmatters.org/commentary/2023/01/inland-empire-california-warehouse-development/.
[76] Ivette Torres, et al., Warehouses, Pollution, and Social Disparities: An analytical view of the logistics industry's impacts on environmental justice communities across Southern California (April 2021), p. 19.
[77] DEIR, Vol. 1, p. 4.3-31 and 4.3-49.
[78] *Id.*, at p. 4.3-49.
[79] *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 716.
[80] DEIR, Vol. 1, p. 4.3-49.
[81] *Id.*, at p. 4.3-49.
[82] *Id.*, at p. 4.3-50.

Second, despite the DEIR's assertion that most air-quality impacts will stem from off-site vehicles, there is no ambient analysis of off-site emissions or long-term emissions. However, the estimate for operational emissions includes discrepant statements and analysis regarding significant levels of the criteria pollutants. In particular, the levels estimated for long term operations of NOx is estimated to be 58.7 tons per year and 39.79 tons of PM10 per year when the significance thresholds for those criteria pollutants are 10 tons per year and 15 tons per year respectively.[83] That is over five times over the significance threshold level for NOx and over double the threshold of PM10. Despite modelling well over significant thresholds, the DEIR only claims that operational activities, even in combination with cumulative projects, could be "potentially significant."[84] Additionally, while under the significance thresholds, the operational estimates for CO and PM2.5 are very close to the threshold levels.[85] As NOx and PM10 and well over significant thresholds, the logical conclusion would be that the impact is significant, at least for these criteria pollutants.

Lastly, the AQIA must also include analysis of the air quality impacts from increased rail traffic indirectly caused by the Project.

2. Traffic Analysis

The DEIR's traffic analysis is contradictory and insufficient. Part V.A discusses the broader deficiencies in the transportation and traffic impact section in more detail. For the purpose of analyzing air quality impact, the DEIR is missing important information regarding the number of vehicles traveled and distances traveled, hours of operation, the processes and analyses of calculations and modeling, stationary source data, and inaccurate information that must be corrected. The travel estimate relied on for the Air Quality Impact Analysis ("AQIA") are also inconsistent with travel estimates discussed in other sections. The AQIA assumed 8,908 weekly trips, including automobile and truck travel.[86] There is no explanation for how the consultants arrived at this estimate. The incomplete and inconsistent information in the AQIA fails to provide the public and decision-makers with accurate information regarding the project's air quality impacts.

In a separate section of the Draft EIR, it describes the off-road equipment, haul-truck trips, on-road worker vehicle trips are anticipated. The DEIR estimates that the project would generate 13,575 trips/day.[87] However, it is not specified if this encapsulates all vehicles, including the off-road cargo handling equipment, off-site truck travel, and/or worker vehicle trips. It is also not stated if these are one- or two-way trips. Also, the length of travel for each truck trip or mean or average was not considered. Overall, it is not clear what the total number of trucks might be and whether the 13,575 trip estimate includes trucks.

[83] *Id.*, at p. 4.3-42; *id.*, at Vol. 2, Appendices A-I, 4.1 Significance Criteria.
[84] *Id.*, at p. 4.3-42.
[85] *Id.*, at p. 4.3-42; DEIR Volume 2, Appendices A-I, 4.1 Significance Criteria.
[86] *Id.*, at Vol. 2, Appendix D: Air Quality Impact Analysis, Appendix B – Project Emission Calculations, p. 8.
[87] *Id.*, at Vol. 1, p. 4.3-47.

Additionally, the DEIR states that 62% of truck trips are anticipated to be heavy duty trucks and the remaining 38% being all other types of trucks.[88] However, without a total truck number or estimate, this percentage is not informative.

Moreover, the DEIR's analysis of project impact and pollutants states that most of the emissions would be associated with off-site vehicles but fails to include the emissions from these vehicles in its modeling and analysis.[89] The emissions from these off-site vehicles need to be accounted for and calculated specifically. The Draft EIR states that the project is projected to generate 13,575 trips a day but provides no further information what type of vehicles this encapsulates.[90] The DEIR simply concludes that it is beneath "CARB's recommended criteria of 50,000 vehicles/day for rural roads" and is therefore acceptable.[91]

Throughout the DEIR, the proposed project relies on the future expansion of Burbank St. This assumption implies a level of traffic increase that as well must be explicit and discussed. More information is necessary to understand the traffic implications of the project, and the subsequent impact on air quality, especially since, as the DEIR states, most emissions are expected to stem from off-site vehicles.

In the absence of any data or discussion of methodology, community members are left to interpret the DEIR's bare assertions and conclusions, which violates CEQA and undermines both decision-making and public trust in decision-making.

3. *Fugitive Dust Emissions*

The County does not go far enough in its analysis of fugitive dust emissions, despite acknowledging its contribution to air pollution and health hazards. The DEIR states that fugitive dust contributes to PM emissions.[92] However, it does not discuss the specific sources of fugitive dust in the Project area and along related truck routes, nor does it attempt to describe where and during which periods fugitive dust levels may be highest. Shafter, along with other rural communities along existing and proposed truck routes, experience high levels of fugitive dust not only from vehicle traffic but also from nut tree harvesting. The cumulative impact of the increase in truck, car, and locomotive traffic as a result of the Project must be analyzed in the EIR. By not doing so, the Draft EIR inadequately discusses the Project's environmental setting for fugitive dust emissions and fails as an informational document under CEQA.

Despite its minimal discussion of fugitive dust emission, the Draft EIR nevertheless concludes that there would be fugitive dust emissions from the Project resulting from vehicular traffic, which would result in adverse health impacts.[93] However, because the County omits a significant amount of vehicle travel from its air quality analysis, these fugitive dust emissions are

[88] *Id.*, at p. 4.3-30.
[89] *Id.*, at p. 4.3-42.
[90] *Id.*, at p. 4.3-47.
[91] *Id.*, at p. 4.3-47.
[92] *Id.*, at p. 4.3-4.
[93] *Id.*, at p. 4.8-15.

improperly excluded from the Draft EIR's air modelling and air quality evaluation.[94] This underestimates the contribution from fugitive dust on the environment and health in violation of CEQA and improperly limits the County's ability to develop all feasible mitigation measures and alternatives.

The County does not provide a substantial justification for how reliance solely on APCD rules to mitigate the impact from fugitive dust[95] will address the full direct impact from vehicular traffic and construction, the indirect impact from increased freight traffic, and the cumulative impact considering other past, existing, and reasonably foreseeable future sources of fugitive dust. Therefore, the Draft EIR fails to propose all feasible mitigation measures as required by CEQA.

4. Additional Emissions from Refrigerated Cargo and TRUs

The DEIR states that "[u]p to 25 percent [of the Project], approximately 2,226,862 square-feet, would include refrigerated warehouse space."[96] It also acknowledges that transport refrigeration units ("TRUs") contribute to off-road mobile sources of diesel PM emissions.[97] Even so, the Draft EIR includes no discussion of the additional air pollution impacts from refrigerated warehouse space and trucks with TRUs. In fact, the AQIA for the Project explicitly states that it is modelling only for "unrefrigerated" warehouses.[98] The EIR must evaluate the air quality impacts from the Project by modeling and calculating the full emissions from refrigerated warehouses and trucks using TRUs to carry cold cargo. These emissions will affect air quality near the Project site as well as along truck routes and will cumulatively contribute to poor air quality. It will also result in health impacts, such as increased cancer risk,[99] which should be discussed in detail in an updated analysis. Without this discussion, the Draft EIR is incomplete and prevents an informed decision in violation of CEQA.

ii. Mitigation Analysis

The DEIR asserts emissions will be reduced by utilizing the mitigation measures described, but not how or which mitigation measure specifically targets which criteria pollutant. The listed mitigation measures appear to target dust and construction impacts, despite the fact that the DEIR identifies off-site emissions are a major air quality impact from the project.

The DEIR also does not make adequate conclusions or analyses regarding meeting attainment of NAAQS or CAAQS or how mitigation measures will achieve attainment in the Air Basin. As demonstrated with data in the DEIR, the Basin is currently in non-attainment for numerous

[94] *Id.*, at p. 4.3-29 to 4.3-30; see also *id.,* Vol. 2, Appendix D, p. 4-6.
[95] *Id.*, at p. 4.8-16 to 4.8-17.
[96] *Id.*, at p. 1-37.
[97] *Id.*, at p. 4.3-13.
[98] *Id.*, at Vol. 2, Appendix D: Air Quality Impact Analysis, Appendix B – Project Emission Calculations, p. 8.
[99] Regional Air Quality Task Force, Western Riverside Council of Governments, *Good Neighbor Guidelines for Siting New and/or Modified Warehouse/Distribution Facilities* (Sept. 2005) p. 8, *available at* https://wrcog.us/DocumentCenter/View/318/Good-Neighbor-Guidelines-for-Siting-Warehouse-Distribution-Facilities-PDF?bidId=.

criteria pollutants. The DEIR states, "the results of the air dispersion modeling…demonstrate that the maximum impacts attributable to the project, when considered in addition to the existing background concentrations, are below the applicable ambient air quality standard for NOx, SOx, and CO," and although particulate matter would be in non-attainment, it would still fall under significant impact levels and therefore sufficient under the ambient air quality standards.[100] Despite the project contributing to each criteria pollutant, bringing it closer and in some levels over the standards, the EIR concludes these measurements are acceptable. Under CEQA, permitting a project that contributes insufficiently mitigated criteria air pollution to the nation's worst air basin is not permissible, nor is it wise, as a matter of public policy.

We have the following concerns with specific proposed air quality mitigation measures:

- **MM 4.3-1 and MM 4.3-2**: These mitigation measures do not go beyond what is already required by the San Joaquin Valley Air Pollution Control District ("APCD");
- **MM 4.3-4**: Since the direct, indirect, and cumulative air emission described in the Draft EIR are incomplete, a Development Mitigation Agreement ("DMA") or Voluntary Emission Reduction Agreement ("VERA") cannot be approved until emissions are accurately depicted and mitigated. Additionally, the use of a DMA/VERA as a mitigation measure may be inappropriate if the APCD is not required to directly mitigate air pollution impacts in the communities experiencing adverse air quality and health impacts. To ensure transparency, any fees collected through this DMA/VERA must be allocated by District following public engagement and only to projects in Kern County, with at least 80% going to benefit overburdened communities in Kern to address disproportionate cumulative impacts.
- **MM 4.3-5**: This measure should be made enforceable. Furthermore, the measure is only focused on workers and fails to mention measures taken to prevent exposure for those driving along the SR-99 or residences across the highway. The flier should be distributed to residents within an area that more accurately covers the area that would be impacted by the project; the 3-mile radius is arbitrary.
- **MM 4.3-6**: The County must provide justification for how it arrived at $3,200. Moreover, this fee must also be paid to the City of Shafter and the City of Bakersfield.
- **MM 4.3-8**: The notice should be distributed to residents and businesses within a larger radius of at least 3-miles of the project site. The notice should be in Spanish and other commonly spoken languages.
- **MM 4**.3-10: All required landscaping should include green barriers for fugitive dust and particle pollution.

iii. Cumulative Analysis

The cumulative air quality impact analysis is not developed, despite significant impacts. The DEIR states that there are 36 cumulative projects planned within a 6-mile radius.[101] Despite

[100] DEIR, Vol. 1, p. 4.3-50.
[101] *Id.*, at p. 4.3-38.

this, the DEIR states they have no available information for these projects.[102] The DEIR still concludes, "the proposed project would result in increased emissions that would exceed project-level significance thresholds..." and would therefore have a significant cumulative impact on air quality and pollutants such as ozone and particulate matter.[103] However, there are many cumulative impacts of these numerous projects in the area, including increased PM and NOx emissions.

iv. Discussion of Health Effects

Lead agencies are obligated to provide detailed disclosure of the health effects related to air contaminants generated by the project, including the concentrations at which such pollution would trigger symptoms, such that the public can understand the health consequences of the proposed project.[104] A mere finding of a significant impact does not relieve a lead agency of the responsibility to analyze a project's impact on health.[105] Not only does the Draft EIR omit accurate air pollution levels as a result of the incomplete air quality analysis, but it also fails to provide required health effect disclosures based on the disclosure air pollution. For example, the Draft EIR does include several paragraphs that describe the general health effects of ozone and NOx exposure, such as how exposure can impact the respiratory system in the short- and long-term and exacerbate existing health conditions.[106] However, when it comes to explaining how the direct, indirect, and cumulative ozone and NOx emissions associated with the Project would impact health, the Draft EIR merely states that there would be mobile-source NOx exhaust emissions that would "vary substantially from day to day but would average out over the course of an operational year."[107] This vague and unsubstantiated discussion falls short of the level of detail required by CEQA, which requires "not merely a determination of whether an impact is significant, but some effort to explain the nature and magnitude of the impact." [108]

The County should recirculate the Project EIR with a detailed discussion of the full air quality impact on health, including a health risk assessment ("HRA"). The Draft EIR concludes that an HRA is not required based on a narrow definition of the scope of the project as defined by the property line.[109] However, as discussed elsewhere in this letter, the Project's indirect impacts, including on health, extend to where the Project will increase truck and freight rail traffic. The limited information provided by the Draft EIR indicates that such traffic will pass near sensitive receptors and "disadvantaged communities" as defined by CARB; therefore, an HRA for this Project is warranted.

[102] *Id.*, at p. 4.3-56.
[103] *Id.*, at p. 4.3-57.
[104] *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 519, citing CEQA Guidelines § 15126.2(a).
[105] *Id.*, at 514, citing *Berkeley Keep Jets Over the Bay Com. v. Board of Port Cmrs.* (2001) 91 Cal.App.4th 1344, 1371.
[106] DEIR, Vol. 1, pp. 4.3-3, 4.3-6 to 4.3-7.
[107] *Id.*, at p. 4.3-30.
[108] *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 519..
[109] *Id.*, at p. 4.3-30.

v. Failure to Comply with All Applicable Standards

The project description and mitigation measures are inconsistent with state and local recommendations and standards.

1. CARB Setback Recommendations

CARB recommends that sensitive land uses not be located closer than 500 feet from major diesel emissions sources, such as freeways or within 1,000 feet of a warehouse.[110] However, the project is within 350 feet of homes.[111] There is also a residential community across SR-99, within approximately 1000 feet from the project.

Additionally, it states that with the estimated 13,575 trips per day for the project, they are beneath the expected vehicles recommended by CARB but do not include existing traffic or expected increase in traffic in the area. This project falls outside of CARB recommendations with no attempts at mitigation, and there is no explanation provided as to why the project cannot accommodate CARB recommendations or why mitigation is infeasible.

2. AB 617 Shafter CERP

California law AB 617 provides resources to communities to implement community specific mechanisms to reduce pollution and improve air quality. CARB selects communities considering existing air burden and socioeconomic indicators. Recognizing Shafter's high air pollution levels, high poverty, and high social vulnerability. Communities implement mechanisms in what is called a Community Emissions Reduction Plan ("CERP"). Everything located within the region is subject to the goals and strategies of the CERP. While the Project does not fall within the boundaries of the AB 617 Shafter Region,[112] it will increase truck and freight rail traffic within the region, particularly if the Project relies on intermodal railyards within the AB 617 Shafter Region. Heavy-duty vehicle emissions are a high community concern in the Shafter CERP.[113] As such, the Project directly implicates the CERP and AB 617 process despite being located outside the community's official boundaries. Proposals for improvement include incentives to replace heavy duty vehicles with zero-emission vehicles, which was not discussed or mentioned in the DEIR.[114] Another concern is fugitive dust, which this project will also produce.[115]

New developments must consider the CERP in its impacts and mitigations. The Shafter CERP includes emission reduction targets for PM2.5 and 10, and NOx that are planned for 2024 and 2029. However, there is no mention in the DEIR how the project will interact with these goals, despite the project's off-site vehicles impacting the Shafter air quality.

---

[110] *Id.*, at p. 4.3-47; California Air Resources Board, Air Quality and Land Use Handbook: A Community Health Perspective (April 2005), p. 4.
[111] DEIR, Vol. 1, p. 3-8.
[112] Shafter Community Boundaries AB 617 Map.
[113] San Joaquin Valley Air Pollution Control District, Community Emissions Reduction Program, Shafter (Sept. 19, 2019), p. 46, *available at* 01-finalshaftercerp-9-19-19.pdf (valleyair.org).
[114] *Id.*, at p. 49.
[115] *Id.*, at p. 433.

B. The County Does Not Adequately Analyze Transportation and Traffic Impacts

CEQA requires lead agencies to properly analyze a project's direct and cumulative transportation and traffic impacts. The criteria for determining the significance of transportation impacts "shall promote the reduction of greenhouse gas emissions, development of multimodal transportation networks, and a diversity of land uses."[116]

While the Draft EIR determines that there will be a significant and unavoidable transportation impact from the proposed project, the analysis contains gaps that limit its use as an informational document and underestimate how the project will impact the environmental and public health. As a result, the Draft EIR also improperly omits feasible mitigation measures that should be incorporated to address the direct and indirect impacts on Kern County's transportation system.

i. Reliance on Incomplete Traffic Study

The Draft EIR relies on a traffic study prepared by Ruettgers & Schuler for its conclusions around transportation and air quality impacts. However, the traffic study in some places relies on conclusory statements without supporting them with the assumptions and sources that contributed to those conclusions. Without this information decision-makers, other agencies, and the public cannot determine whether the traffic report's conclusions are valid. The accuracy of this analysis is crucial for a project of this size. Based on the Draft EIR's own estimates, the Project will more than double the amount of traffic on SR 99 and SR 65.[117] Just at the SR 99 and Lerdo Highway intersection, the traffic study estimates that the project will add an additional 421 vehicles **per hour** during peak hours.[118] These figures would already have an enormous impact on the surrounding environment and communities, but if they underestimate traffic, air quality, and other impacts will go unaddressed.

The lack of supportive evidence or explanation is especially glaring in how the study determined the number of trips that would be generated by the project.[119] The study references the models it used but omits the assumptions used in its modeling, such as where trucks would be coming from or traveling to, hours of operation for the industrial park, etc. The Draft EIR's conclusions related to both transportation and air quality impacts hinge on the accuracy of the rates applied as the County entered the traffic study's daily trip rate for trucks and passenger vehicles into CalEEMod.[120]

Other inconsistencies within the Draft EIR raise concerns about the traffic study's estimates of truck trips. In the Draft EIR's discussion of truck stalls, Phase 1 includes 3,568 truck stalls and

---

[116] Pub. Res. Code, § 21099(b)(1).
[117] "Traffic volumes on nearby roadways average approximately 1,649 vehicles/day on SR 65 and approximately 2,852 vehicles/day on the adjacent segment of SR 99." DEIR, Vol. 1, p. 4.3-47.
[118] DEIR, Vol. 3, Appendix L, LOS Appendix.
[119] The traffic study refers to both the trip generation date and the ADT rate. *Id.*, at Vol. 3, Appendix L, p. 12-13.
[120] *Id.*, at Vol. 1, p. 4.3-30.

Phase 2 includes 924, for a total of 4,492 truck stalls.[121] This is a significant difference from the traffic study estimate that the Project will generate 2,694 truck trips in phase 1 and 3,313 truck trips in phases 1 and 2.[122]

Another inconsistency with the traffic study is the arbitrarily shaped study area that it uses for its analysis. For example, in evaluating roadway ADT and capacity, the traffic study modelled ADT primarily to the east of SR-99, including as far as Merle Haggard and Chester Ave (over 4.5 miles from the southern boundary of the project area.[123] Meanwhile, its modelling west of SR-99 toward Shafter only goes as far as Calloway Dr., which is approximately 1 mile from the southern project boundary. The traffic study fails to acknowledge or explain this discrepancy. Under CEQA, agencies must consider "geographically distant impacts on their activities."[124] If the traffic study improperly failed to analyze increased traffic near Shafter, this could result in a substantial underestimate of traffic, air quality, and other impacts on environmental justice communities.

ii. Inadequate VMT analysis

Since July 1, 2020, lead agencies under CEQA are required to base transportation impacts on the amount of vehicle miles traveled ("VMT") generated by a project.[125] Agencies have the discretion to develop thresholds of significance supported by substantial evidence and may consider thresholds previously adopted or recommended by other agencies or experts.[126] However, the threshold applied must still be an "identifiable quantitative, qualitative, or performance level of a particular environmental effect."[127] Moreover, even the existence of a threshold will not relieve an agency of its duty to consider evidence determine the significance of an impact.[128]

Here, the County fails to apply a VMT threshold that can be used to determine—using the "careful judgment" required by CEQA—whether this Project will have a significant effect on the generation of vehicle miles traveled.[129] Since Kern County has not yet adopted its own threshold of significance for VMT,[130] the Draft EIR relies on a traffic study that applies the OPR guidance and thresholds for "office space" projects as a basis for its analysis.[131] The traffic study's analysis is extremely limited and makes no attempt to quantitatively or qualitatively evaluate construction traffic or the on- and off-site truck traffic that would also be generated by the Project, thereby providing incomplete VMT analysis.

---

[121] *Id.*, at Vol. 3, Appendix L, p. 61.
[122] *Id.*, at pp. 13-14.
[123] *Id.*, at p. 33.
[124] *Muzzy Ranch Co. v. Solano Cnty.* (2007) 41 Cal.4th 372, 388.
[125] Pub. Res. Code § 21099; CEQA Guidelines § 15064.3.
[126] CEQA Guidelines §§ 15064.7(c); 15064(b); see also *Mission Bay Alliance v. Office of Community Investment & Infrastructure* (2016) 6 Cal.App.5th 160, 206.
[127] CEQA Guidelines § 15064.7(a).
[128] *Id.*, at § 15064.7(a); see also *Center for Biological Diversity v. Department of Fish & Wildlife* (2015) 62 Cal.4th 204, 231.
[129] See CEQA Guidelines § 15064(b).
[130] DEIR, Vol. 1, p. 4.16-12.
[131] *Id.*, at p. 4.16-12; Vol. 2, Appendix L, pp. 10-11.

The County's only justification for the exclusion of truck traffic from its VMT analysis is the conclusory statement that "VMT evaluation is limited to automobiles and light trucks."[132] However, this narrow reading of the CEQA statute and Guidelines would undermine the obligation agencies have to evaluate the impact of all phases of a project evaluate on the environment.[133] CEQA must be interpreted "as to afford the fullest possible protection to the environment within the reasonable scope of the statutory language."[134] An industrial park project of this size by its nature will increase the amount of vehicle trips through the surrounding communities (acknowledged by the County in its LOS analysis); therefore the County must analyze and mitigate if the impact is adverse and substantial.

The Draft EIR acknowledges that trucks and construction vehicles are part of the vehicle trips generated by the Project. The EIR states that "[t]he proposed project would generate *short-term temporary trips during construction* and permanent employee commuter, *arrival and distribution trips during operation* of the proposed project."[135] The DEIR estimates that the Project will add at least 2,694 to 3,313 daily truck trips on the local roads and highways and 13,575 total trips/day.[136]

Despite the discussion of construction impacts in other portions of its traffic analysis, there is no mention of how the construction period would impact short-term VMT generation.[137] The Draft EIR must also look at the impacts from construction on VMT and the VMT of construction vehicles. Caltrans guidance states that "[i]mpacts associated with construction of a project may also require VMT analysis, particularly for large projects or projects located a considerable distance from urbanized areas."[138]

The Office of Planning and Research ("OPR") recommends that "[f]or any project that increases vehicle travel, explicit assessment and quantitative reporting of the amount of additional vehicle travel should not be omitted from the document; such information may be useful and necessary

[132] *Id.*, at Vol. 2, Appendix L, p. 10.
[133] CEQA Guidelines § 15126 ("All phases of a project must be considered when evaluating its impact on the environment: planning, acquisition, development, and operation.").
[134] *Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376, 390, citing *Friends of Mammoth v. Board of Supervisors* (1972) 8 Cal.3d 247, 259).
[135] DEIR, Vol. 1, p. 4.16-15 (emphasis added).
[136] *Id.*, at Vol. 3, Appendix L, pp. 13-14; see also *id.*, Vol. 1, p. 4.3-47.
[137] C.f., discussion of transportation impact at DEIR, p. 4.16-3; see also discussion of construction impacts in air quality section (p. 4.3-29).
[138] California Department of Transportation, Transportation Analysis Under CEQA (Sept. 2020) p. 20, *available at* https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-09-10-1st-edition-tac-fnl-a11y.pdf [hereinafter "Caltrans CEQA Analysis Guide"].

for a full understanding of a project's environmental impacts."[139] The CEQA Guidelines encourage qualitative evaluations where no models or methods exist.[140]

The County should rely on existing resources to develop a methodology for estimated heavy-duty truck VMT. Caltrans in its CEQA technical guide describes the components of qualitative transportation CEQA analysis[141] and how to compare and a baseline with future no-build conditions,[142] among other guidance. There are also studies on different methodologies for estimating heavy-duty truck vehicle miles traveled (or vehicle-distance traveled).[143]

An EIR with transportation analysis that fails to consider the impact from such an increase in truck and construction traffic on rural roads will fail as an informational document in violation of CEQA. The traffic study the County relies on does not reflect a "good faith effort at full disclosure,"[144] which requires application of existing methodologies to "estimate the full extent of vehicle travel from a project."[145]

iii. Improper reliance on LOS as a threshold for significant transportation impact

Public Resource Code § 21099 states that "[u]pon certification of the guidelines by the Secretary of the Natural Resources Agency [], automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion shall not be considered a significant impact on the environment pursuant to this division, except in locations specifically identified in the guidelines, if any."[146]

The County has ignored this statutory mandate and relied primarily on level of service ("LOS") to determine whether there would be an adverse and substantial impact on the environment from the Project. The DEIR states that "[d]espite the fact the State of California approved SB 743 to change the primary basis of evaluation of traffic deficiencies in CEQA LOS [sic] to VMT, the service goal for roadway facilities in Kern County is LOS "C" within the Metropolitan Bakersfield area and LOS "D" outside of the metropolitan area."[147] This is explicitly prohibited

---

[139] Governor's Office of Planning and Research, Technical Advisory on Evaluating Transportation Impacts in CEQA (Apr. 2018), p. 20, *available at* https://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf [hereinafter "OPR Technical Advisory"].

[140] CEQA Guidelines § 15064.3(b)(3) ("If existing models or methods are not available to estimate the vehicle miles traveled for the particular project being considered, a lead agency may analyze the project's vehicle miles traveled qualitatively.")

[141] Caltrans CEQA Analysis Guide, p. 18, https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-09-10-1st-edition-tac-fnl-a11y.pdf ("A qualitative analysis describes why or why not an increase in VMT is likely; how much induced travel is created, if any; and whether that increase, if any, will have a significant impact.")

[142] Caltrans CEQA Analysis Guide, p. 17.

[143] See, e.g., Johnathan D. Regehr and Mark J. Reimer, Methodology to Estimate the Distance Traveled by Trucks on Rural Highway Systems, 139 Journal of Trans. Engineering 4 (2012).

[144] CEQA Guidelines, § 15151.

[145] OPR Technical Advisory, at p. 4.

[146] Pub. Res. Code § 21099(b)(2).

[147] DEIR, Vol. 1, p. 4.16-16.

by CEQA as of 2020 when Section 15064.3 of the CEQA Guidelines became applicable statewide.[148] Instead, CEQA requires lead agencies to use VMT "as the proper metric for analyzing transportation impacts."[149]

Rather than rely on LOS to measure significance for the Project, the County must recirculate the Draft EIR with a valid VMT analysis as discussed in Part IV.B.ii above.

iv. Shafter General Plan Inconsistency

The County must consider how the proposed Project conflicts with any City of Shafter policies, including policies in its General Plan. The City of Shafter finalized its most recent General Plan in 2005. The General Plan includes several transportation and circulation policies that are undermined by the Project. The Draft EIR fails to address these inconsistencies or propose mitigation measures that would ensure consistency with Shafter's General Plan policies.

These policies include, but are not limited to:

- Establishing truck routes away from residential areas.[150] The Draft EIR acknowledges there will be an increase in truck traffic but fails to adequately evaluate or model the number of trucks (as discussed in more detail in Parts IV.A.i and IV.B.i) or the routes the trucks may take through or near the City of Shafter. As a result, the Draft EIR also neglects any discussion of what actions need to be taken to prevent this influx of trucks from driving through communities, many of which are already overburdened by air pollution.
- Developments should be responsible for the impacts of their projects through the establishment of mitigation fee programs and landscape requirements along right-of-way as a condition of project approval.[151] The Draft EIR makes no mention of traffic impact mitigation fees for the impacts on the City of Shafter[152] and fails to require right-of-way landscape requirements within its street improvement plans for MM 4.16-4, MM 4.16-5, and MM 4.16-8.

[148] CEQA Guidelines § 15064.3(c) ("Beginning on July 1, 2020, the provisions of this section shall apply statewide."); see also *id.,* at § 15064.3(a) ("[A] project's effect on automobile delay shall not constitute a significant environmental impact.") and *Citizens for Positive Growth & Preservation v. City of Sacramento* (2019) 43 Cal.App.5th 609, 626 [255 Cal.Rptr.3d 889] ("[T]he 2035 General Plan's impacts on LOS (i.e., automobile delay) cannot constitute a significant environmental impact. . .")

[149] *Ocean Street Extension Neighborhood Assn. v. City of Santa Cruz* (2021) 73 Cal.App.5th 985, 1021, citing CEQA Guidelines, § 15064.3.

[150] Shafter General Plan (2005), p. 3-7 ("3.5-2: Designate truck routes separate from residential areas to allow the efficient movement of goods to and from industrial areas.")

[151] Policy 3.2-7: "Pursue establishment of traffic impact mitigation fees on new development to ensure that transportation improvements are constructed in a timely manner," and Policy 3.2-20: "Develop consistent requirements for landscaping along rights-of-way of arterials, major collectors, and minor collectors to be implemented through conditions of approval on adjacent developments." Shafter General Plan (2005), p. 3-4.

[152] MM 4.16-1 requires that the developer pay a Transportation Traffic Impact fee to the City of Bakersfield before any building permit may be issued.

- Developments must promote transit, bicycle, and pedestrian travel and avoid decreasing mobility to improve travel and connections within Shafter (including between housing and employment areas) and between Shafter and other parts of the region.[153] The Draft EIR fails to discuss how the Project (particularly truck traffic into and through Shafter) will disrupt transit, bicycle, and pedestrian traffic. It also fails to develop mitigation measures or alternatives to improve mobility through more transit options and improved bicycle and pedestrian travel options through infrastructure investments.

v. Draft EIR underestimates transportation hazards from the project

Another significance threshold applied by the County is whether the Project will "[s]ubstantially increase hazards due to a design feature . . . or incompatible uses."[154] As part of its analysis to determine whether a significant adverse effect on transportation and traffic exists, the Draft EIR rightfully evaluates use of heavy construction equipment on roadways. The County, however, falls short of considering the hazards from adding thousands of heavy-duty trucks per day onto nearby roads, including in the City of Shafter and overburdened unincorporated communities where such an increase in truck traffic would be an incompatible use.

Increased truck traffic generated by warehouse and goods movement projects like this one will not only increase the hazards for passenger vehicles but will exacerbate an already unsafe environment for non-drivers in Kern County and Shafter where there is underinvestment in road improvements and a lack of sidewalks, crosswalks and pedestrian crossings, stormwater drainage, bike lanes, and reliable public transit in most communities outside of the Metro Bakersfield area. If trucks are using routes that pass through residential or commercial areas, pedestrian and bicycles could be impacted.

---

[153] The Shafter General Plan includes the following transportation policies:
- Policy 3.4-1: "Coordinate land use and site design with transportation in such a way as to enhance the opportunity for transit, bicycle, and pedestrian travel between housing and employment areas." Transportation Policy 3.4-4: "Promote the use of fixed schedule transit service within the City and encourage transit connections between Shafter and other parts of the region."
- Policy 3.4-6: "To the extent feasible, ensure that road-way improvement projects do not decrease mobility or accessibility for bicyclists or pedestrians."
- Policy 3.4-9: "Orient site design in non-residential areas to allow for safe and convenient pedestrian access from sidewalks, transit and bus stops, and other pedestrian facilities, in addition to access through required parking facilities."
- Policy 3.4-10: "Maximize visibility and access for pedestrians and encourage the removal of barriers for safe and convenient movement of pedestrians."
- Policy 3.4-11. "Provide, as appropriate, bicycle lanes (Class II) along arterial streets and high volume collector streets, as well as along major access routes to schools and parks."
- Policy 3.4-13. "Demand-actuated traffic signals should include push buttons to signal the need for pedestrians to cross, and include audible signals and countdown signs to assist the disabled in crossing streets. Demand-actuated traffic signals corresponding with bicycle routes should include bicycle sensitive loop detectors or push buttons adjacent to the curb."

Shafter General Plan (2005), p. 3-5.

[154] DEIR, Vol. 1, p. 4.16-15.

Another major hazard from increased truck traffic is the wear and tear on roads. There are already examples of where disinvestment and truck traffic have resulted in large potholes along rural roads. Potholes not only result in harms to vehicles going over them, but contribute to accidents.

The Project will increase truck traffic along SR-99, which was ranked as the deadliest highway in California this year.[155] In the past year alone, there are many examples of accidents involving semi-trucks in Kern County's rural roads, some of which result in deaths, fires, and hazardous waste leaks:

- Oct 2023: A semi-truck crash resulted in a leak from a ruptured tank and blocked traffic.[156]
- Sept 2023: A semi-truck that caught fire on Highway 46, and then spread to a ¼ acre of grass before the fire department extinguished it. Two other vehicles crashed as a result of the slow down for the burning truck, resulting in serious injuries.[157]
- March 2024: A head-on collision between a semi-truck and a car resulted in the death of the car driver and minor injuries to a child.[158]
- April 2024: A semi-trailer crash killed a bicyclist in Bakersfield.[159]
- May 2024: A semi-truck crash resulted in multiple injuries and an overturned truck blocking several lanes of traffic.[160]
- August 2024: A semi-truck carrying fertilizer caught fire (releasing toxic smoke) and started a vegetative fire on ½ acre of grass.[161]

[155] *Highway 99 rated deadliest in California, study says*, Yahoo!news (June 14, 2024), *available at* https://www.yahoo.com/news/highway-99-rated-deadliest-california-010100098.html.
[156] *Lanes reopen after semi-truck crash on southbound I-5*, Bakersfield Now (Oct. 16, 2023), *available at* https://www.bakersfieldnow.com/news/local/expect-delays-after-semi-truck-crash-on-southbound-i-5-causes-2-lane-closures-kern-county-interstate-5-grapevine-california-highway-patrol.
[157] *1 person left with major injuries in crash on Hwy. 46 amid semi-truck fire response*, Bakersfield Now (Sept. 20, 2023), *available at* https://bakersfieldnow.com/news/local/van-crash-into-fire-engine-causes-delays-on-highway-46-amid-semi-truck-fire-response-lost-hills-california-highway-patrol-kern-county.
[158] *CHP: 40-year-old man dead after head-on crash with semi-truck in Rosamond*, Bakersfield Now (Mar. 11, 2024), *available at* https://bakersfieldnow.com/news/local/deadly-crash-in-rosamond-spills-50-gallons-of-fuel-closes-frontage-road-west-rosamond-boulevard-california-highway-patrol-kern-county.
[159] *BPD: Bicyclist dies in semi-trailer collision on Wible Road*, Bakersfield Now (Apr. 26, 2024), *available at* https://bakersfieldnow.com/news/local/bpd-bicyclist-stuck-killed-by-semi-trailer-on-wible-road-collision-planz-road-bakersfield-police-department-kern-county-coroner-california.
[160] *Overturned semi-truck slows traffic along Hwy 99 near Taft Highway*, KGET (May 1, 2024), *available at* https://www.kget.com/news/local-news/overturned-semi-truck-slows-traffic-along-hwy-99-near-taft-highway/.
[161] *Firefighter injured as semi-truck fire spreads to grass on Highway 58*, Bakersfield Now (Aug. 3, 2024), *available at* https://www.bakersfieldnow.com/news/local/fire-closes-highway-58-in-mojave-hazardous-materials-burn-kern-county-fire-department-california-highway-patrol-sand-canyon-road-cameron-road-california.

The County must consider the fatal and non-fatal crash rate of trucks, particularly in rural areas, when evaluating the hazards from the direct and cumulative increase in truck traffic.[162] The FMCSA has found that fatal crashes involving large trucks[163] "often occur" in rural areas and on Interstate highways, which are the types of roads trucks traveling to and from the project would use.[164] Nationally, fatal crashes involving large trucks and truck occupant fatalities have increased.[165]

In California in 2021, there were 14,034 large trucks involved in fatal and non-fatal crashes, with 354 resulting in deaths.[166] 305 of those trucks were intermodal container chassis trucks[167] of the type that would likely frequent the proposed Project site. Moreover, 211 of those crashes involved large trucks with Haz-Mat placards and at least 15 where cargo was released, including 10 instances of release of flammable liquids or solids.[168] As described above, in the last year alone there have already been deaths, fires, and toxic releases from semi-truck accidents in Kern County, not to mention the rest of the state, country, and world.

DEIR should be recirculated with a complete evaluation of the hazards from a large increase in truck traffic near the project and through communities like Shafter.

vi. Cumulative Transportation Impact is Underestimated

Because the cumulative impact project list leaves off facilities and proposals that would contribute toward increased truck traffic, the Draft EIR underestimates the cumulative transportation impacts from this Project. That is a major deficiency because the Draft EIR determined that there was a significant and unavoidable cumulative transportation impact from

---

[162] *Keep Our Mountains Quiet v. County of Santa Clara* (2015) 236 Cal.App.4th 714, 736 [187 Cal.Rptr.3d 96].) ("[E]vidence of a heightened accident rate in the area supports a fair argument that doubling the traffic volume for two hours on event days (including one hour after dark) may have a significant impact on traffic safety.")

[163] The definition of "large truck" for the purpose of the FMCSA data is broad and does not only include heavy-duty trucks.

[164] Federal Motor Carrier Safety Administration, Large Truck and Bus Crash Facts 2021, *available at* https://www.fmcsa.dot.gov/safety/data-and-statistics/large-truck-and-bus-crash-facts-2021, (last accessed Aug 13, 2024). ("Approximately 54 percent of all fatal crashes involving large trucks occurred in rural areas, 26 percent occurred on Interstate highways, and 12 percent fell into both categories by occurring on rural Interstate highways.")

[165] In 2021, nationally 5,149 large trucks were involved in fatal crashes, a 23-percent increase from 2016. From 2016 to 2021 truck occupant fatalities increased by 24 percent to 1,008. A total of 5,688 people died from large truck crashes in 2021. *Id.*, Trends Table 4: Large Truck Fatal Crash Statistics 1975-2021.

[166] Federal Motor Carrier Safety Administration, Crash Statistics, California: Summary Report – Large Trucks (last accessed Aug. 13, 2024), *available* here.

[167] Federal Motor Carrier Safety Administration, Crash Statistics, California: Cargo Body Type – Large Trucks (last accessed Aug. 13, 2024), *available* here.

[168] Federal Motor Carrier Safety Administration, Crash Statistics, California: Hazardous Materials – Large Trucks (last accessed Aug. 13, 2024), *available* here.

the project on its own.[169] The traffic analysis indicates that even without the project there will be a large increase in vehicle traffic by 2042. For example, at the SR-99 and Lerdo Highway intersections, the traffic study estimates that by 2042 there will be 3,000 additional vehicles/hour during peak hours.[170] Approximately 46 percent of that traffic would be headed toward Shafter and/or I-5.[171]

As a result of this major increase in truck traffic, the Draft EIR must consider the Project's impact in the context of the existing and proposed warehouse/industrial park proposals, existing and proposed railyards and rail expansion projects, and existing and proposed road and interchange expansion projects. The County's failure to consider these projects has resulted in a deficient cumulative transportation impact analysis. As a result, the County must recirculate the Draft EIR with updated analysis.

vii. Proposed Transportation Mitigation Measures are Insufficient to Reduce Significant Transportation Impact

The County's proposed mitigation measures to address transportation impacts are insufficient given the inadequate analysis and fall short of mitigation of impacts to less-than-significant level. This is reflected in some of the Draft EIR's own documentation. For example, the traffic study showed no difference in number of vehicles during peak hours with or without mitigation.[172] In addition to other mitigation measures that the County must incorporate into the EIR to mitigate the full impact from the Project, particularly on overburdened communities, there are important changes that the County should make to its proposed mitigation measures regarding transportation impacts:

- **MM 4.16-2:** The Traffic Index analysis should be carried out and circulated before the Final EIR is finalized so that adequate mitigation measures and/or alternatives can be developed.
- **MM 4.16-4, MM 4.16-5, MM 4.16-8**: The street improvement plans approved by the Kern County Public Works Department should also explicitly include green barriers between the development and the road; sufficient lighting; shade structures for transit users, pedestrians, and bicycle users; adequate space for future transit stops; bike lanes; and green infrastructure to eliminate flood risk and mitigate any increased heat island effects. The plans must also make clear that the developer shall have maintenance and operational responsibility over any such improvements.
- **MM 4.16-1, MM 4.16-6 and MM 4.16-7**: The City of Bakersfield and Kern County should provide an opportunity for the public and communities directly impacted by the

[169] As discussed above, we maintain that this is an underestimation of the full transportation impact because the Draft EIR improperly relies on increased congestion as measured by LOS, does not look at the full impacts from all truck traffic on safety, general plan consistency, and VMT. DEIR, Vol. 1, p. 4.16-28.
[170] *Id.*, at Appendix L, LOS Appendix.
[171] *Ibid.* Traffic study modeled 3,000 vehicles/hour in the 2042 future. We estimated the traffic that would be headed toward Shafter on the traffic patterns that would route vehicles westbound on Lerdo Highway,
[172] DEIR, Vol. 3, Appendix L, p 28; see also LOS appendix, pdf p. 1480

project to provide input on how the funding received **from** the Project developer is allocated. All fees should include funding for long-term road maintenance.

- **MM 4.16-12**: As written, the MM allows the developer to avoid implementing portions of the mitigation measure and instead allow deliveries, construction travel, and oversize load hauls during off-peak hours and through residential neighborhoods if the developer determines it is not "feasible" to avoid these hazardous impacts. However, these components of the Construction Traffic Control Plan *are* feasible and should be required without any loopholes. The developer's desire to move construction forward quickly should not come at the cost of community health and well-being.

There are additional mitigation measures that the County should consider incorporating into a Draft EIR in Part V.

C. Water Quality and Supply Impacts

The Draft EIR's description of water use by the Project is inadequate and incomplete. An EIR must include a detailed statement describing all "significant effects on the environment of the proposed project."[173] The County fails to provide such a statement regarding water impacts and therefore must recirculate an updated analysis that complies with CEQA.

The DEIR is unreliable because it does not rely on current, accurate data to determine the project's water use. Kern County relies heavily on groundwater for municipal and agricultural purposes. Given the severe nature of the ongoing drought in Kern, whether the allotted water described in the DEIR will be available is unclear. The DEIR claims that 350,000 gallons (just over one acre-foot, or about half the volume of an Olympic-size swimming pool) of water will be utilized throughout a twenty-five-year period during construction and that 591-acre feet per year (AFY) of groundwater will be used for the project's operation including/plus106 AFY from the Kern River.[174] This amount of water does not consider the lack of groundwater that Kern currently faces and whether the construction or operation of this project will eventually require tapping into groundwater from municipal wells in the area.

Additionally, Phase 2 of this project also estimates at least 106 AFY to be supplied through Kern River Water via the North Kern Water Service District.[175] However, this estimate is potentially flawed, and the DEIR needs to explain where this water will be retrieved from should this water be unavailable. In 2022, American Rivers named the lower Kern River one of the most endangered rivers,[176] largely due to "excessive water withdrawals." In 2023 and 2024, Kern County has faced excessive rainfall, with 3 above-normal months of abundant rain this year

[173] CEQA Guidelines § 21100(b)(1).
[174] DEIR, Vol. 1, p. 4.10-25.
[175] *Id.*, at p. 4.10-25.
[176] Lower Kern River named among America's Most Endangered Rivers of 2022, American Rivers (April 18, 2022), https://www.americanrivers.org/media-item/lower-kern-river-named-among-americas-most-endangered-rivers-of-2022/.

alone.[177] At the same time, Kern County has been registered as being in a Stage 2 drought and currently faces drought restrictions from the State Water Board.[178] Given the fluctuating nature of the River's water availability, as it is affected by unpredictable rainfall and droughts, Kern County needs to amend its analyses of this project's utilization of the Kern River as a water source for Phase 2 of this Project. For these reasons, the Kern River's water supply has changed vastly in recent years due to the changing climate that the DEIR does not consider. This unreliable, inaccurate information leads to flawed alternatives and mitigation measures. The project should not rely on an endangered river for part of the Project's projected water demand, and relying on a fleeting water source demands a higher level of analysis in the DEIR.

D. Greenhouse Gas Emissions

The County is required to analyze the greenhouse gas emission ("GHG") impacts from the project. Under CEQA, agencies must evaluate GHG emission by either quantifying estimated GHG emissions from project or developing qualitative performance standards, such as meeting Climate Action Plan targets.[179] The Draft EIR relies on significance thresholds developed by APCD[180] because Kern County has not developed its own significance thresholds. Given the increase of these types of proposed projects in the region and the outsized impact from the transportation sector on climate change, Kern County should develop its own significance threshold(s).

The methodology used by a lead agency to inventory a project's GHG emissions must be explained and supported by substantial evidence.[181] A project's GHG estimates must include all lifecycle emissions, including construction, operations, and changes in traffic patterns. The Draft EIR includes GHG emission estimates ("for disclosure purposes") but does not include a sufficiently detailed explanation of how it arrived at these estimates to allow for informed decision-making and adequate public review.

Additionally, the Draft EIR acknowledges that "GHG emissions would be largely associated with off-road equipment use, as well as on-road vehicle operations associated with workers commuting to and from the proposed project site and haul-truck trips"[182] However, as discussed in other sections, the Draft EIR has an incomplete discussion of travel estimates, particularly for trucks, which would indicate that the Draft EIR's GHG emission inventory for travel relies on artificially low estimates. Moreover, the Draft EIR does not evaluate rail traffic in any way, despite the Project likely contributing to an increase in rail traffic along the UP and BNSF freight rail lines. The Draft EIR also fails to evaluate the emissions from refrigerated warehouse space and use of TRUs. These are major gaps in its GHG emission analysis as well and must be corrected and recirculated for public

---

[177] Celine Stevens, Kern County sees another above average rain year, but not as severe as 2023 (Mar. 28, 2024), https://m.bakersfieldnow.com/news/local/kern-county-sees-another-above-average-rain-year-but-not-as-severe-as-2023.

[178] State Water Board adopts emergency water conservation regulation, City of Bakersfield, https://www.bakersfieldcity.us/379/Water-Resources.

[179] CEQA Guidelines, § 15064.4.

[180] *Id.*, at p. 4.8-17.

[181] *Tsakopoulos Investments, LLC v. County of Sacramento* (2023) 95 Cal.App.5th 280, 306; see also CEQA Guidelines, § 15064.4(c).

[182] DEIR, Vol. 1, p. 6-36.

input before the EIR is finalized. The County must develop new mitigation measures and alternatives as necessary to address all significant impacts the updated analysis reveals.

The Draft EIR also impermissibly punts much of the responsibility to address GHG impacts onto CARB, stating that "[g]iven the uncertainties in identifying, let alone quantifying the impact of any single project on global warming and climate change. . . any further feasible emissions reductions would be accomplished through CARB regulations adopted pursuant to AB 32."[183] While a lead agency should ensure compliance with local and statewide climate plan, it must include project design features as formal mitigation measures that include a clear commitment to implementation, monitoring and enforcement.

For these reasons, the County must update its GHG emission impact analysis for the EIR to serve as an adequate informational document under CEQA.

E. Hazards and Hazardous Materials

i. Pesticide Use

The County does not analyze whether organochlorine pesticides linger in the Project site's soil, citing that "it is unknown if environmentally persistent pesticides and herbicides were ever applied to the proposed project." As conceded by the County, these chemicals are known to have lingering effects, which can cause harm to the environment and severe health impacts to persons within proximity.[184] Although the County claims that the "potential for elevated concentrations of environmentally persistent pesticides to exist in the near-surface soils … is low," a more thorough analysis should be undertaken to avoid the lasting effects of organochlorine pesticides on the future operation of this site.

ii. General Plan Consistency

According to the Kern County General Plan, zoning and other land use controls must "be used to regulate and, in some instances, to prohibit development in hazardous areas."[185] The DEIR cites hazardous conditions dating back from 1989 to 2019, but fails to provide an analysis of current conditions or proper analysis of the property, citing a Hazardous Materials Evaluation Report without describing all of the conditions that may implicate this project site.[186] Without further

---

[183] *Id.*, at p. 4.8-20.

[184] *See* Ravidran Jayaraj, *Organochlorine pesticides, their toxic effects on living organisms and their fate in the environment*, PubMedCentral (May 2017), https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5464684/

[185] Kern General Plan, p. 12-13.

[186] DEIR, Vol. 1, p. 4.9-3 – 4.9-6; *see* Shafter Airport EnviroStor Report (15070029), Department of Toxic Substances Control, https://www.envirostor.dtsc.ca.gov/public/profile_report?global_id=15070029. The DEIR mentions the nearby Meadows Field Airport but fails to mention the land restrictions due to "pesticide residues in rainwater [that] contaminated the surrounding bare soil (Zone A) with dinoseb, paraquat, furadan and arsenic." Between 1985 and 1992, this site was under remediation and is capped under land covenants set forth by the Department of Toxic Substances Control. The DEIR omits this information that is relevant to the analysis of the project site.

information and analysis, the Project may also violate the guidelines set forth in the General Plan.

F. Growth-Inducing Impacts

CEQA requires that an EIR discuss how a project could induce growth where it is reasonably foreseeable, which could include fostering economic or population growth, requiring construction of new service facilities, or encouraging activities that cause significant environmental effects.[187] These impacts must be analyzed even if the extent of the growth is difficult to calculate.[188] Where "construction of the project [cannot be] easily undone, and [where] achievement of [the project's] purpose would almost certainly have significant environmental impacts, the project should not go forward until [growth-inducing] impacts [are] evaluated in the manner prescribed by CEQA."[189]

The Draft EIR inappropriately focuses its growth-inducing impacts analysis on the temporary and permanent jobs created by the Project and the housing and population growth associated with those jobs.[190] Even this narrow analysis flawed and incomplete. The section provides no explanation for how it arrived at its employment estimates of 5,000 to 6,000 permanent employees, nor how many of these employees would work on-site. There is also no discussion of the accompanying loss of jobs as a result of removing over 700 acres of active agricultural land. Furthermore, the Draft EIR fails to describe where these growth-inducing employment impacts would be experienced; in other words, would the same agricultural workers that would lose their jobs have a pathway to access the new jobs in the warehouse and logistics industry? The lack of detail and unsubstantiated conclusions in the growth-inducing discussion falls short of CEQA's requirement to provide sufficient information for an informed decision and public input.

Furthermore, the Draft EIR fails to analyze the growth-inducing impact of increased freight throughput in Kern County, which will lead to physical changes in the environment as discussed throughout this letter. Cargo volumes will not increase to the same extent absent the Project. Moreover, the Project is closely connected with other projects that will increase freight traffic, such as highway and interchange expansions. As a result, the County must properly analyze the ripple effect this Project would have on freight cargo movement throughout the County beyond alleged job creation.

G. Biological Resources

The Draft EIR does not sufficiently evaluate the impact of the Project on special status species and habitats. The scope of its analysis is too narrow and the what analysis the EIR does include is vague and lacking important information necessary to permit decision-makers to make an informed decision. First, the Draft EIR improperly limits the environmental setting as the immediate Project site. However, as discussed in previous sections, since CEQA requires that even geographically distant impacts be analyzed, the EIR must include a discussion of the environmental setting beyond

[187] CEQA Guidelines, §§ 15126.2(d), 15064(e), 15131(a); see also, *Napa Citizens for Honest Gov't v. Napa County Bd. Of Supervisors* (2001) 91 Cal.App.4th 342, 368.
[188] *Napa Citizens for Honest Gov't v. Napa County Bd. Of Supervisors* (2001) 91 Cal.App.4th 342, 368.
[189] *Ibid*.
[190] DEIR, Vol. 1, p. 5-6.

the Project site, particularly along the major truck and rail routes that would serve the Project. This includes 7th Standard Road, Lerdo Highway, SR-65, SR-99 and any other relevant routes. As a result, the environmental setting must include a discussion of the preserved land along 7th Standard Road between SR-99 and I-5 – the Buttonwillow Ecological Reserve, in addition to any other similar preserved land.

Second, the methodology used to carry out the Biological Reconnaissance Survey is flawed and the information contained therein is out of date since it was carried out in August 2019. The Biological Resources Report states that a visual survey was conducted along the perimeter and that the survey was conducted during a time with "high probability of visual detection" but no further details are provided about the time of day, length of survey, and precise locations of the survey.[191] The time and length of the survey is especially important since the likelihood of observing special status species will vary greatly based on the time of day and may have resulted artificially low detection of specials status species. It is also not clear whether the Mesa Biological LLC received a project description from the Project proponent, which should have informed their analysis.

Third, given the improper discussion of the environmental setting and the reliance on a flawed and out of date biological resources survey, the County should update its impact analysis and determine if more mitigation measure and/or alternatives are necessary to address the fully biological resources impact from the Project.

H. Aesthetics Impact

Aesthetic impacts include damage to the "existing visual character or quality of public views" of the project site and its surroundings.[192] The Project would cause a substantial impact on the aesthetics of the area, shifting it from an agricultural area to an industrial zone. The Draft EIR acknowledges this shift, finding that the Project "would promote [visual] disharmony" and therefore would have a significant impact.[193] However, the Draft EIR bases its conclusion solely on viewpoint simulations of the future buildings and did not discuss the impact of increased truck traffic on the site and along the surrounding roads and highways. This is also a major aesthetic shift and must be considered. Similarly, the proposed mitigation measures focus on the building design and landscaping and do not propose mitigation measures that would address the aesthetic impact of adding thousands of trucks a day onto nearby roads and highways, nor the impact of increased freight locomotives.

The Draft EIR also determines that there would be a significant and unavoidable cumulative impact on aesthetics due changes in visual resources and light/glare.[194] It acknowledges that "[i]ncreased urban, industrial, and manufacturing development[] lead[ing] to increased nighttime light and glare and subsequent sky glow in the region and more limited views of the night sky."[195] Even so, the EIR does not propose any feasible mitigation measures or alternatives to avoid this adverse harm on the surrounding communities. This is improper under CEQA and must be addressed in a recirculated EIR.

---

[191] DEIR, Vol. 2, Appendix F, p. 6.
[192] CEQA Guidelines, Appendix G.
[193] DEIR, Vol. 1, p. 4.1-17.
[194] *Id.*, at p. 4.1-29.
[195] *Id.*, at p. 4.1-30.

V. THE COUNTY HAS NOT INCLUDED ALL FEASIBLE MITIGATION MEASURES

A lead agency must describe and adopt all feasible and enforceable mitigation measures to minimize the significant environmental impacts from a project through an open process.[196] The Draft EIR must discuss all available measures that could mitigate an impact and describe the basis for selecting the appropriate measures.[197] Mitigation measures proposed by interested agencies and the public should be considered.[198] The County cannot approve this project if there are "feasible mitigation measures available which would substantially lessen the significant environmental effects" of the Project available that address unmitigated impacts of the Project.[199]

The mitigation measures proposed in the DEIR are inadequate to address the Project's impacts in a variety of ways, as described in detail in the sections above. The County must adopt additional feasible mitigation to reduce the Project's impact before certifying the Final EIR. Despite unmitigated harms from the project, the DEIR fails to propose mitigation measures including air quality mitigation, and water quality and supply mitigation, other transportation mitigation, and other general mitigation measures.

A. Air Quality Mitigation Measures

In order to mitigate the full air quality impacts from the Project, including emissions that are not analyzed or described in the Draft EIR, the County should adopt the following additional mitigation measures:

- Establish set truck routes in an open process with Kern County residents;
- Before the approval of a building permit, require preparation and approval of a truck routing plan with public input describing the facility's hours of operation, types of items to be stored, and truck routing to and from facility to designated truck routes that avoid passing sensitive receptors. Plan should include measures to prevent truck queuing, circling, and stopping on public streets. Plan should hold facility operators responsible for violations of the truck routing plan, and a revised plan should be required from any new tenant that occupies the properly before a business license is issued. Kern County should retain discretion to determine if changes to the plan are necessary, including any additional measures to alleviate truck routing and parking issues that may arise. Any chances to the plan must be subject to public review and comment;
- Require landowners and/or tenants to meet feasible milestones for investing in zero-emission vehicles, equipment, charging stations, and grid infrastructure. Zero-emission

[196] Pub. Res. Code § 21002; CEQA Guidelines § 15126.4(a)(1); *Communities for a Better Environment v. City of Richmond* (2010) 184 Cal.App.4th 70, 93.
[197] CEQA Guidelines, § 15126.4(a)(1)(B).
[198] *Communities for a Better Environment v. City of Richmond* (2010) 184 Cal.App.4th 70, 93 ("Fundamentally, the development of mitigation measures, as envisioned by CEQA, is not meant to be a bilateral negotiation between a project proponent and the lead agency after project approval, but rather, an open process that also involves other interested agencies and the public.").
[199] Pub. Res. Code § 21002; see also, CEQA Guidelines § 15002(a)(3) (agencies must prevent avoidable damage "whenever it finds measures to be feasible").

cargo-handling equipment and heavy-duty trucks are market-ready, with more models becoming commercially available every year.[200] Whether a technology is considered "zero-emission" must consider all emissions along the full life cycle of the fuel, such that hydrogen produced using fossil fuels or biomass should not fall within the measure's definition of "zero-emission."

- Require air filters and replacement filters to be regularly distributed to residents within 1 mile of the Project site and established truck routes.

B. Water Quality and Supply Mitigation Measures

Here, the Draft EIR underestimates the Project's environmental effects, leading to inadequate mitigation measures that would not neutralize the Project's negative impacts. An EIR must include an adequate consideration of facially feasible mitigation measures that "substantially lessen the significant environmental impacts."[201] The County was unable to provide feasible mitigation measures as a result of its insufficient information in the project description and inadequate impact analysis.

The mitigation measures and alternatives offered are inadequate because they underestimate the significance of specific hydrology impacts. Moreover, for the impacts the County does find significant, the measures they provide are insufficient to properly mitigate those significant impacts. Because the mitigation measures are based on a poorly described and analyzed project, their efficacy at reducing significant impacts is speculative, at best.

In addition to improving these proposed mitigation measures, the County should also develop new mitigation measures based on an updated and more accurate water impact analysis. Such new mitigation measures could include enforceable strategies for capping water use, a fair-share fee, and requiring the installation of porous rock on an area adjacent to the impermeable surfaces to better hold floodwaters.

i. Groundwater Mitigation Measures

In particular, the DEIR fails to provide an adequate mitigation measure for the decrease in groundwater supply. The DEIR estimates that 350,000 gallons of water will be used to construct the facility. It estimates that operation would require an annual water demand of 591 acre-feet per year (AFY). This groundwater will be pumped from off-site sources, such as Oildale Mutual Water Company's six-inch domestic and 12-inch non-potable water lines. 4.10-3; 4.10-25. Breaking it down further, Phase 1 of the project would require 485 AFY of water, and the assumption is that the remaining 106 AFY will be utilized for Phase 2. The County claims that the expected 591 AFY water demand is "less than half of the 1,256 AFY currently allocated to

[200] Moving Forward Network, Making the Case for Zero-Emission Solutions in Freight: Community Voices for Equity and Environmental Justice (May 2021), pp. 40-42; CALSTART, Zeroing In On Zero-Emission Trucks: Market Update (May 2024), *available at* https://calstart.org/wp-content/uploads/2024/05/ZIO-ZET-May-2024-Market-Update_Final.pdf; CALSTART, Zero-Emission Trucks: The Facts (Aug. 2024), *available at* https://calstart.org/wp-content/uploads/2024/08/ZETs-the-Facts-August-2024_Final.pdf.

[201] Pub. Res. Code §21100(b)(1).

the project site for agricultural operations." However, despite there being less water supply allocated to the project, the DEIR concedes that an increase of impervious surfaces would "result in increased rates of stormwater runoff during rainy periods, which can be a source of surface water pollution" and water that would otherwise resupply the groundwater supply on agricultural land, would be collected elsewhere.[202]

Mitigation Measure 4.18-2 would be implemented to "ensure that any groundwater or reclaimed water used is accounted for should the project require additional water supplies over the allotment from the District." This measure allows the operator to collect information on groundwater or reclaimed water usage before building permits, and it requires that water meters be installed to monitor water use. Still, it does not provide any mechanisms to ensure that no more water than is needed should be extracted. Although this measure calls for the prohibition of water use from unmetered wells and states that only groundwater from metered wells can be used, no efforts have been put in place to reduce the overconsumption of groundwater. Projects of this scale are predicted to utilize a vast amount of water. Although monitoring is essential, there are no mechanisms put in place should the project extract more water than is estimated in this DEIR. Collecting monitoring data without any requirement to use that data to inform behavior—such as capping water use—is unlikely to reduce water use significantly. Therefore, this measure is not an adequate mitigation measure, as it only focuses on monitoring rather than reducing water usage.

Mitigation Measure 4.10-1 and 4.10-2 are intended to mitigate the issues caused by stormwater runoff.[203] Both measures consist of plans with no specifications on mitigating such problems due to their nature being future and/or delayed plans. According to CEQA guidelines, mitigation measures must clearly avoid or reduce the project's effects to a less-than-significant level, and mitigation must not be deferred until later.[204] Because this measure does not outline a plan that clearly addresses the reduction of impacts from runoff and there is no set timeline for when this plan will be finalized or enforced, this is an inadequate mitigation measure. The DEIR claims that the implementation of MM 4.10-1 and MM 4.10-2 would make it so the Project operation does not violate water quality standards or waste discharge requirements or "otherwise degrade water quality, and impacts would be less than significant," but this is conjecture at best without mechanisms put in place to ensure this mitigation will accomplish this goal. [205]

i. Flood Prevention Mitigation Measure

As explained above, the County relies on a 2008 FEMA flood map to conclude that there is a 0.2% chance of flooding and provides no mitigation measures for flooding. However, given the undeniable change in our climate in the past sixteen years and the record rainfall that has hit the County in recent years due to climate change reliance on out-of-date maps alone is inappropriate. This is especially the case because inundation carries the risk of pollutant contamination on the land, surface, and groundwater channels, as well as neighboring communities.

[202] DEIR, Vol. 1, p. 4.10-22.
[203] *Id.*, at p. 1-80, p. 4.10-23.
[204] CEQA Guidelines § 15070; see also CEQA Guidelines § 15126.4, subd. (a)(1)(B)
[205] DEIR. Vol. 1, p. 4.10-23.

Furthermore, the Project is estimated to be covered by impermeable surfaces made of asphalt or concrete. Currently, the approximately 739 acres that will house this Project consists of vineyards and vacant, undeveloped land[206] This land will be redeveloped into an industrial use space composed of 24 buildings, driveways, parking lots, truck courts, and retention basins on those 739 acres of existing vineyard and vacant land.[207] While the project touts a retention basin for surface drainage and stormwater drainage, the lack of a flood mitigation measure is an oversight because all these buildings, driveways, and parking infrastructure require a solid foundation of an impermeable surface.[208] This Project also extends beyond the 739 acres, as road widening and other cumulative impact projects will further exacerbate flood risk and stormwater pollution.

Without this project, water could seep into the ground more easily or run to local waterways and/or any nearby levees due to the current lack of a solid foundation. However, adding concrete and asphalt surfaces drastically changes the scenarios in which abundant rainfall and floods may affect the Project site.
As stated above, Kern County has faced excessive rain in recent years. In this case, the failure to adequately consider the proposed infrastructure to inform a feasible mitigation measure is an oversight.

For these reasons, not providing a mitigation measure aligned with current data is inadequate; consequently, this DEIR is incomplete.

C. Transportation Mitigation Measures

Once the County has carried out an adequate transportation and traffic impact analysis, it must develop additional mitigation measures to address the direct, indirect, and cumulative transportation impacts from the Project. These mitigation measures should include:

- Transportation Traffic Impact fee for the City of Shafter. MM 4.16-1 requires the developer pay a Transportation Traffic Impact fee to the City of Bakersfield before any building permit may be issued. MM 4.16-6 requires analysis about the fair share payments to Kern County based on trip generation and distribution before the second grading or building permits. Given the transportation impact that the Project will directly and indirectly have on the City of Shafter, the County must develop a traffic impact fee structure to ensure that the City can adequately maintain its road infrastructure over the long-term and ensure mitigation of the cumulative traffic impacts on its residents. This recommendation is consistent with OPR's Technical Advisory on Evaluating Transportation Impacts in CEQA.[209]

[206] *Id.*, at p. 1-35.
[207] *Id.*, at p. 1-37.
[208] *Id.*, at p. 3-54.
[209] OPR Technical Advisory, at p. 23 ("Fee programs are particularly useful to address cumulative impacts. (CEQA Guidelines, § 15130, subd. (a)(3) [a "project's incremental contribution is less than cumulatively considerable if the project is required to implement or fund its fair share of a mitigation measure or measures designed to alleviate the cumulative impact"].)").

- The County must develop feasible mitigation measures for VMT impacts following a complete VMT analysis if it determines a significant impact. Those mitigation measures could include:
    - Mitigation fee programs;
    - Transportation management plans;
    - Regional VMT-reduction programs.
- Design, clearly mark and enforce truck routes that keep trucks out of residential neighborhoods and away from sensitive receptors.
- Before the approval of a building permit, require preparation and approval of a truck routing plan with public input describing the facility's hours of operation, types of items to be stored, and truck routing to and from facility to designated truck routes that avoid passing sensitive receptors. Plan should include measures to prevent truck queuing, circling, and stopping on public streets. Plan should hold facility operators responsible for violations of the truck routing plan, and a revised plan should be required from any new tenant that occupies the properly before a business license is issued. Kern County should retain discretion to determine if changes to the plan are necessary, including any additional measures to alleviate truck routing and parking issues that may arise. Any chances to the plan must be subject to public review and comment;
- Consult with local public transit agencies to secure increased public transit service to the project area for workers. If a service area does not currently exist, developer should establish a vanpool available to industrial park workers.
- Prepare a construction traffic control plan prior to grading, detailing the location of equipment staging, material stockpiles, proposed road closure and hours of construction operation, and optimize the plan to minimize impact to roads used by cars, transit busses, vanpools, pedestrians, and bicycle users.

D. Additional General Mitigation Measures

Given the Project's extensive cumulative impacts on communities across the county, the County should develop and adopt broad mitigation measures that will specifically mitigate these cumulative impacts, particularly on health.

One such mitigation measure could include requiring the Project proponent to enter into a Community Benefit Agreement following meaningful engagement with impacted communities (including Shafter and unincorporated communities such as Mexican Colony, Cherokee Strip, and Smith Corner). This Agreement must provide direct benefits to communities impacted by the Project's cumulative impacts and those benefits must be designed by those same communities. One such benefit could include a community fund based on a set annual fee per sq. foot that impacted communities could access to fund projects in their communities.

Another broad mitigation measure could include requiring tenants to utilize the cleanest available technology as time goes on, ensuring that any technology-specific requirements in the EIR's mitigation measures are flexible enough to require investment in cleaner and more health-protective technology as it becomes available.

In addition to the measures described above, the County should also incorporate mitigation measures as recommended by the Office of the Attorney General in its Warehouse Best Practices guidelines.[210]

E. The EIR must Discuss the Impact of Mitigation Measures

Under CEQA, "if a mitigation measure would cause one or more significant effects in addition to those that would be caused by the project as proposed, the effects of the mitigation measure shall be discussed, but in less detail than the significant effects of the project as proposed."[211] An EIR must do more than mention the impact but must actively include those impacts within its analysis.[212] Any mitigation programs that would have a significant impact must undergo CEQA evaluation, either in this Project EIR or separately.[213]

VI. THE COUNTY HAS NOT ADEQUATELY ANALYZED ALTERNATIVES

The California Supreme Court has described the alternatives and mitigation sections as "the core" of an EIR.[214] The requirement to set forth project alternatives in the EIR "is crucial to CEQA's substantive mandate that avoidable significant environmental damage be substantially lessened or avoided where feasible."[215] CEQA guidelines provide that "[a]n EIR shall describe a range of reasonable alternatives to the proposed project, or to the location of the project that could feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives."[216] Lead agencies may eliminate alternatives from detailed consideration in the DEIR for: "(i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts."[217] However, "if the agency finds certain alternatives to be infeasible, its analysis must explain in meaningful detail the reasons and facts supporting that conclusion."[218]

---

[210] State of California, Department of Justice, Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act (Sept. 2022), *available at https://oag.ca.gov/system/files/media/warehouse-best-practices.pdf*.

[211] *Save Our Peninsula Committee v. Monterey County Bd. of Supervisors* (2001) 87 Cal.App.4th 99, 130, citing former Guideline § 15126(c) (citations omitted).

[212] *Ibid.*, citing *Environmental Defense Fund, Inc. v. Coastside County Water Dist.* (1972) 27 Cal.App.3d 695, 706.

[213] *California Native Plant Society v. County of El Dorado* (2009) 170 Cal.App.4th 1026, 1055-56; OPR Technical Advisory, at p. 23.

[214] *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 564. See also CEQA Guidelines § 15002(a)(3) (describing prevention of significant, avoidable damage to environment "by requiring changes in projects through the use of alternatives or mitigation measures when the government agency find the changes to be feasible.")

[215] Michael H. Remy, et. al, Guide to the California Environmental Quality Act at 431 (10th ed. 1999) (citations omitted).

[216] CEQA Guidelines § 15126(a). CEQA does not require all alternatives to meet all project objectives, only most of them. *Id.*, § 15126.6.

[217] CEQA Guidelines, § 15126.6(c).

[218] *Marin Municipal Water District v. KG Land Corporation California* (1991) 235 Cal.App.3d 1652, 1664.

Here, the County may not approve the Project if there are feasible alternatives that would "substantially lessen its significant environmental effects."[219] The alternatives analysis in the Draft EIR both fails to consider other feasible alternatives and lacks the level of detail necessary for meaningful public input and informed decision-making. The DEIR must examine in detail the alternatives the County determines could feasibly attain most of the objectives of the project.[220] A sufficiently detailed discussion of project alternatives achieves CEQA's dual purposes of fostering meaningful public participation and informed decision making.[221]

The County has failed to consider alternatives that would comply with CARB guidance calling for warehouse facilities to be located at least 1,000 feet from sensitive receptors.[222] The Draft EIR must include alternative locations remote enough to avoid adverse harms to other communities.

Moreover, the DEIR does not make a good faith effort at disclosure regarding Alternative 3. The County does not provide sufficient detail to allow decision-makers to make an informed decision about whether this alternative is feasible and likely to reduce impacts to less than significant levels. In particular, the Draft EIR fails to adequately describe the precise location, the environmental setting, or how close the property is to sensitive receptors.[223] What the Draft EIR does discuss is conclusory, unsupported, and in some instances internally inconsistent. For example, the County states that Alternative 3 would not have significant water supply usage impacts because the location is not subject to adjudication or the Sustainable Groundwater Management Act ("SGMA").[224] Then, in a different section, the Draft EIR states that "it is impossible to know the impacts that Alternative 3 would have on the groundwater basin and existing drainage patterns without a site-specific Geotechnical Evaluation and field survey" and makes no reference to SGMA at all.[225] Even so, the County lands on the same unsubstantiated conclusion that the impacts to hydrology and water quality would be less than significant. This is just one example of the flawed discussion in the Draft EIR alternatives analysis.

---

[219] *Save Panoche Valley v. San Benito Cnty.*, 217 Cal. App. 4th 503, 520 (2013) (citations omitted); *see also* Pub. Res. Code § 21081(a); CEQA Guidelines, § 15091(a).

[220] See *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 733 (an alternatives analysis "must contain sufficient detail to help ensure the integrity of the process of decisionmaking by precluding stubborn problems or serious criticism from being swept under the rug. It must reflect the analytic route the agency traveled from evidence to action. An EIR which does not produce adequate information regarding alternatives cannot achieve the dual purpose served by the EIR, which is to enable the reviewing agency to make an informed decision and to make the decisionmaker's reasoning accessible to the public, thereby protecting informed self-government.") (citations omitted).

[221] CEQA Guidelines, § 15126.6(f).

[222] California Air Resources Board, Air Quality and Land Use Handbook: A Community Health Perspective (April 2005); State of California, Department of Justice, Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act (Sept. 2022), p. 5.

[223] *Id.*, at pp. 6-31 to 6-41. For example, in the air quality section, the Draft EIR acknowledges that the air quality impact cannot be fully assessed because of a lack of "knowledge of the specific alternative site and the locations of nearby sensitive receptors." *Id.*, at p. 6-33.

[224] *Id.*, at p. 6-10 to 6-11.

[225] *Id.*, at p. 6-37.

If, following an adequate description of Alternative 3, the EIR determines that it would have significant impacts on neighboring communities, the County should reject this alternative.[226] We are strongly opposed to the relocation of this Project to other communities given health harms associated with the proposed Project. The County should also commit to carrying out an EIR of the project if it selects Alternative 3.

VII. THE DRAFT EIR PRECLUDES MEANINGFUL PUBLIC REVIEW

Community living near the Project or along the truck and rail cargo routes that will serve the Project must have an opportunity to be informed about the Project and meaningfully engage in the CEQA process. Given the local and regional impact of a project like this one, the County should provide opportunities for the public to ask questions and provide comments on the County's environmental analyses and have their input incorporated into decision-making, mitigation measures, and the Final EIR.

That has not occurred for this Project to date. The County declined a request for additional time to review over 4,000 pages of technical materials and to hold a public hearing ahead of the close of the public comment period. The County also did not sufficiently justify why it failed to provide notice of the Draft EIR in Spanish and failed to translate any portion of the Draft EIR into Spanish or other commonly spoken languages. In choosing not to translate these materials, the County undermined the ability of the largely Spanish-speaking public to engage in the process, which works against the purposes of CEQA and principles of democratic governance and transparency. As such, this failure to translate constitutes a violation of CEQA. Further, the choice not to even explain why the County chose not to translate is itself an abuse of discretion in violation of CEQA.

//

//

//

//

//

//

//

//

[226] Alternatively, the County should commit to carrying out a full EIR of the project if it selects Alternative 3.

For the reasons stated above, the County should revise and recirculate the Malibu Vineyards Draft EIR to comply with CEQA and Government Code § 11135.

Sincerely,

Natalia Ospina
Kayla Karimi
Grecia Orozco
The Center on Race, Poverty & the Environment

Diana Mireles
Comite Progreso de Lamont

Anabel Marquez
Committee for a Better Shafter

Estela Escoto
Committee for a Better Arvin

Gloria Herrera
Delano Guardians Committee

Cc:

Supervisor David Couch, Kern County Board of Supervisors (couchd@kerncounty.com)

Jessica Olsen, Air Quality Analysis and Research Supervisor, San Joaquin Valley Air Pollution Control District (Jessica.olsen@valleyair.org)

California Attorney General's Office, Environmental Justice Bureau (ej@doj.ca.gov)

Morgan Capilla, U.S. Environmental Protection Agency, Air Division, Region 9 (capilla.morgan@epa.gov)